

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection **RAYMARK**
PAD 00 301 5328

DATE: **11/29/85**

DM: Joseph S. Arena
Environmental Scientist (3HW11)

File

u: **JAMES WEBB, Acting**
Peter W. Schaul, Chief
RCRA Enforcement Section (3HW11)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY
REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS
REQUIRED AT THIS TIME.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III
CENTRAL REGIONAL LABORATORY
839 BESTGATE ROAD
ANNAPOLIS, MARYLAND 21401

301-224-2740
FTS-922-3752

DATE : November 4, 1985

SUBJECT: RCRA Compliance Sampling Report
Raymark Industrial Division, Manheim PA (PAD003015328)

FROM : Ronald Jones *RJ*
Engineering Technician (3ES14)

TO : Peter Schaul
Chief, RCRA Enforcement Section (3HW11)

THRU: Leo J. Clark *[Signature]*
Chief, Annapolis Field Section (3ES14)

On September 24, 1985, the EPA's Central Regional Laboratory conducted a RCRA Compliance Sampling Inspection at the Raymark Industrial Division, Manheim, Pennsylvania. Enclosed is a copy of the inspection report including all appropriate forms, checklists, analytical results, etc.

Should you have any questions regarding the enclosed report, please contact this office.

Enclosures
a/s

RJ/baj

RCRA Sampling Inspection
Trip Report

Raymark Industrial Division
123 E. Steigel Street
Manheim, Pennsylvania
(717) 665-2211

EPA ID No. PAD003015328

September 24, 1985

EPA Representatives:

Ronald Jones
Engineering Technician

Gerry Donovan
Engineering Technician

Facility Representative:

George R. Houser
Manager - Plant Engineering

On September 24, 1985, the EPA's Central Regional Laboratory conducted a RCRA Sampling Inspection at the Raymark Industrial Division (PAD003015328) as per a special request from the Regional Office. Samples were collected at two locations (1) Building 70E-Brake Lining and (2) Building 74 - Clutch Facings. This waste is wet down before disposing in the landfill, located on the facility site, because of the asbestos content in the waste. This landfill is unlined and a problem arises because of the excess water being deposited there along with the waste. The Regional Office requested that a Paint Filter Liquids Test be done on the sample, however, the solids content of the sample was too high for this test to be properly performed. Consequently, an alternate procedure had to be employed for determining liquid content.

The results of the test done at CRL indicates the amount of moisture in the sample from Building #70E to be 51.8%. The sample from Building #74 yielded a moisture content of 71.8%. The lab results are attached to this report.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III
CENTRAL REGIONAL LABORATORY
839 BESTGATE ROAD
ANNAPOLIS, MARYLAND 21401

301-224-2740
FTS-922-3752

DATE : October 30, 1985

SUBJECT: Percent Moisture Analysis of Raymark Samples
RCRA, 850925-01 - 02

FROM : Ronald H. Altman *RA*
Chemist

TO : John Austin
Acting Chief, Annapolis Laboratory

THRU : E. Ramona Trovato *ET*
Team Leader, Inorganic Analysis Section

The results of the % moisture analysis for samples 850925-01 - 02 are presented below. Originally, the Paint Filter Liquids Test was requested for these two samples, however, it was determined that the samples contained a large amount of solids making the Paint Filter Liquid Test difficult to perform. The procedure used for the % moisture is found on page 3-58 of the Procedures for Handling and Chemical Analysis of Sediment and Water Samples.

Sample Description and Results:

<u>Lab No.</u>	<u>Description</u>	<u>% Moisture</u>
850925-01	Raymark Industrial Div., Sta. 1, Bldg. #70E	51.8 + 0.4
-02	Raymark Industrial Div., Sta. 2, Bldg. #74	71.8 \pm 3.3

RHA:ad

cc: P. J. Krantz
QA0, CRL

CHAIN OF CUSTODY RECORD

[illegible]

Distribution: Original Accompanies Shipment; Copy to Coordinator Field Files

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection

DATE: 10/14/85

RAYMARK IND. PAD 00 301 5328

FROM: Joseph S. Arena
Environmental Scientist (3HW11)

TO: File

cc: Peter W. Schaul, Chief *for Dave for*
RCRA Enforcement Section (3HW11)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE VIOLATIONS.

CO.

WM-117: 2/85

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF SOLID WASTE MANAGEMENT

INSPECTION REPORT GEN

Site ID # PAD003 015 328 License # _____
Site Name: Raymark Industrial Division Phone # (717) 665-2211 x 372
Address 123 E Stiegel St.
City Manheim State PA Zip Code 17545
Municipality Manheim County Lancaster
Responsible Official Craig R Smith Title President + General Manager
Person Interviewed George R Houser Title Project Engineer
Dennis Weiler
Inspector Greg Harder

Inspection Type (Generator Only)

<input type="checkbox"/> Routine	<input type="checkbox"/> 11 Part B	<input checked="" type="checkbox"/> 51 Routine	<input checked="" type="checkbox"/> Hazardous	<input type="checkbox"/> Treatment
<input type="checkbox"/> Follow Up	<input type="checkbox"/> 12 Complaint	<input type="checkbox"/> 54 Follow Up	<input type="checkbox"/> Residual	<input type="checkbox"/> Storage
<input type="checkbox"/> Crit Stage	<input type="checkbox"/> 13 Withdrawn	<input type="checkbox"/> 56 Sample	<input type="checkbox"/> Municipal	<input type="checkbox"/> Disposal
<input type="checkbox"/> Sample Only	<input type="checkbox"/> 14 Closure	<input type="checkbox"/> 60 Survey		<input type="checkbox"/> Generator
<input type="checkbox"/> Permitting	<input type="checkbox"/> 15 Post Closure	<input type="checkbox"/> 62 Complaint		<input type="checkbox"/> Processing
<input type="checkbox"/> Superfund	<input type="checkbox"/> 50 Record Rev	<input type="checkbox"/> 70 Record Rev		<input type="checkbox"/> Surface App
<input type="checkbox"/> Ground Water	<input type="checkbox"/> 99 Other	<input type="checkbox"/> 98 Other		<input type="checkbox"/> Transporter
<input type="checkbox"/> Survey				

Site ID # PAD003015328 On-Site Start Time 10:00
On-Site End Time 2:00
On-Site Total Time 4:00

Due Date	Inspection Date	Type	Inspector ID #	# Violation	Enforcement
<u>7/23/85</u>	<u>07/23/85</u>	<u>511</u>	<u>2307</u>	<u>00</u>	<u> </u>

Comment GEN 11MSA

Sample # Low Sample # High

Monitoring Points Sampled

<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

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Entered Comis 7-30-85
AUG 1 1985

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part 1

1-NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

INANCE US	3	4	REQUIREMENT	CHAPTER CITATION
			<i>Rayma-4</i> <i>7-23-85</i>	75.262
			Identification number	(c) (1)
			Hazardous waste shipments offered only to licensed transporters	(c) (4)
			Authorization received from TSD facility for wastes shipped off-site	(d)
			PA manifest used for intrastate shipments	(e) (1) (i)
			Disposer state manifest or EPA format manifest used for out-of-state shipments	(e) (1) (iii)
			Manifests filled out properly and completely	(e) (1)
			Manifests routed properly and within time limits (24 hours)	(e) (2)
			Proper U.S. DOT shipping containers or packages	(f) (1) (i)
			Shipping containers marked and labeled according to U.S. DOT	(f) (1) (ii)
			Containers of 110 gal. or less marked with required PA label	(f) (1) (iii)
	X		Placards offered to transporter	(f) (2)
			Wastes accumulated on-site for less than 90 days	(g) (1)
			Wastes stored in proper containers and properly marked and labeled	(g) (1) (ii)
			Containers managed in accordance with 75.265(g)	(g) (1) (iii)
			Containers clearly marked with accumulation date and visible for inspection	(g) (1) (iv)
	X		Records retained at designated location for 20 years	(h)
			Quarterly reports submitted to the Department	(i)
			Exception reporting procedures followed <i>no exceptions reported</i>	(j)
	X		Hazardous waste disposal plan, if required	(l)
	X		Spill reporting procedures followed <i>SEE comments</i>	(m) (1)
			Preparedness, Prevention and Contingency Plan approved and implemented	(m) (5)
	X		Special requirements followed for international shipments	(o)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF SOLID WASTE MANAGEMENT

INSPECTION REPORT **TSD**

Site ID #	<u>PAD003 015 328</u>	License #	
Site Name:	<u>Rayman Industrial Division</u>	Phone #	<u>(717) 665-2211 x372</u>
Address	<u>123 E Stiegel St.</u>		
City	<u>Manheim</u>	State	<u>PA</u>
Municipality	<u>Manheim</u>	County	<u>Lancaster</u>
		Zip Code	<u>17545</u>
Responsible Official	<u>Craig R Smith</u>	Title	<u>President & General Manager</u>
Person Interviewed	<u>George R Housen</u> <u>Dennis Weller</u>	Title	<u>Project Engineer</u>
Inspector	<u>Greg Harder</u>		

Inspection Type		(Generator Only)			
<input checked="" type="checkbox"/> Routine	<input type="checkbox"/> 11 Part B	<input type="checkbox"/> 51 Routine	<input checked="" type="checkbox"/> Hazardous	<input type="checkbox"/> Treatment	
<input type="checkbox"/> Follow Up	<input type="checkbox"/> 12 Complaint	<input type="checkbox"/> 54 Follow Up	<input type="checkbox"/> Residual	<input type="checkbox"/> Storage	
<input type="checkbox"/> 5 Crit Stage	<input type="checkbox"/> 13 Withdrawn	<input type="checkbox"/> 56 Sample	<input type="checkbox"/> Municipal	<input checked="" type="checkbox"/> Disposal	
<input type="checkbox"/> 6 Sample Only	<input type="checkbox"/> 14 Closure	<input type="checkbox"/> 60 Survey		<input type="checkbox"/> Generator	
<input type="checkbox"/> 7 Permitting	<input type="checkbox"/> 15 Post Closure	<input type="checkbox"/> 62 Complaint		<input type="checkbox"/> Processing	
<input type="checkbox"/> 8 Superfund	<input type="checkbox"/> 50 Record Rev	<input type="checkbox"/> 70 Record Rev		<input type="checkbox"/> Surface App	
<input type="checkbox"/> 9 Ground Water	<input type="checkbox"/> 99 Other	<input type="checkbox"/> 98 Other		<input type="checkbox"/> Transporter	
<input type="checkbox"/> 0 Survey					

Site ID #	<u>PA D 0 0 3 0 1 5 3 2 8</u>	On-Site Start Time	<u>10:00</u>		
		On-Site End Time	<u>2:00</u>		
		On-Site Total Time	<u>4:00</u>		
Issue Date	Inspection Date	Type	Inspector ID #	# Violation	Enforcement
<u>7/23/85</u>	<u>07/23/85</u>	<u>01</u>	<u>2307</u>	<u>00</u>	<u>00</u>
Comment	<u>TSD INSP</u>				
Sample # Low	<u> </u>	Sample # High	<u> </u>		
Monitoring Points Sampled					
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

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TREATMENT, STORAGE, DISPOSAL FACILITIES - STORAGE (Containers and Tanks)

75.265

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

RANGE RUS		REQUIREMENT	CHAPTER CITATION
3	4		
		Containers managed to prevent leaks and spills	(q) (1), (4)
		Containers are compatible with waste stored.	(q) (2)
		Containers are closed during storage	(q) (3)
	X	Container storage area inspected weekly for leaks, deterioration, etc.	(q) (5)
		Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q) (6)
		Satisfactory procedures followed for handling incompatible wastes.	(q) (7), (8)
		Incompatible wastes separated or protected from other materials.	(q) (9)
		Containers and tanks labeled to identify accurately hazardous waste contained.	Act 97 Section 403(b) (2)
		Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	(r) (2)
		Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r) (3)
		Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(r) (4)
		Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.	(r) (4)
		Continuously fed tanks equipped with a means to stop the inflow.	(r) (5)
		Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.	(r) (6)
		Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	(r) (7)
		Discharge control equipment inspected once each operating day.	(r) (8) (i)
		Monitoring equipment data inspected once each operating day.	(r) (8) (ii)
		Liquid level of tanks inspected once each operating day.	(r) (8) (iii)
		Construction materials of tanks inspected weekly.	(r) (8) (iv)
		Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.	(r) (8) (v)
		All hazardous waste removed from tanks and related appurtenances at closure.	(r) (9)
		Placement of ignitable or reactive waste only with the Department's approval	(r) (10)
		Covered tanks in which ignitable or reactive waste is treated or stored meets NFPA buffer zone requirements.	(r) (11)
		Precautions taken for handling ignitable, reactive or incompatible waste or material	(r) (12)

Raymond
7-23-85

TREATMENT STORAGE, DISPOSAL FACILITIES AND LANDFILLS

75.265

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

[illegible]

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

Date of Inspection 7-23-85 Identification Number

City, Installation Name Razmak

Municipality

Inspection of Landfill, drum accumulation area, and related facilities conducted by Sam Israel and C.K. Lee of EPA, George House and Dennis Weller of Razmak, and Tom Miller and self at DER. Operation of the unlined hazardous waste landfill and its pending permit application was discussed.

A spill of unknown waste or material was found between the drum accumulation area and building 67. Distressed vegetation and elevated H-v readings were observed. The spill and associated contaminated soil should be removed for proper disposal within five (5) working days. Please provide a written confirmation upon completion, including the disposal site used and an identification of the spilled material.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. Findings of this inspection are shown in this report. Any violations which were uncovered by the inspection are indicated. Violations may also be discovered upon examination of results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Interviewed (signature) mailed 7-30-85 Date

Inspector (signature) S. S. Hatcher Date 7-20-85

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

of Inspection 8-26-85 Identification Number PAP98055054
ny, Installation Name _____
y _____ Municipality _____

A joint inspection conducted with EPA of the
Lancaster Stabilized Disposal Site. Present were:
Lee Steiner Chester Co. SWA
Donald Frost EnviroSafe International
Anna Wojciechowski EPA
George Houghton EPA
Joe Arena EPA
Arthur L Dilla Piazza DER
Greg Harder DER

The erosion channels noted during inspection
of 5-15-85 have been filled, seeded, and
mulched.

Submission of Groundwater study, completion of
proper closure, and post closure care requirements
were discussed.

inspection report is official notification that a representative of the Department of
onmental Resources, Bureau of Solid Waste Management, inspected the above installation.
findings of this inspection are shown in this report. Any violations which were uncovered
g the inspection are indicated. Violations may also be discovered upon examination of
results of laboratory analyses and review of Department records. Notification will be
coming, confirming any violations indicated herein and listing any additional violations.

n Interviewed (signature) (mailed)

Date

actor (signature) S J Harder

Date

8-27-85

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Trip Report

DATE: JUL 31 1985

FROM:

Sam Israel *C.K. Lee*
Sam Israel, C.K. Lee
Pennsylvania Section (3HW33)

TO:

Patrick R. Anderson, Chief
Pennsylvania Section (3HW33)

Sam Israel and C.K. Lee of EPA, and Tom Miller and Greg Harder of DER-Harrisburg Regional Office conducted a joint site visit at Raymark Corporation in Manheim, Pennsylvania, on July 23, 1985. A followup meeting with Raymark personnel was held on July 24, 1985 at the DER-Harrisburg Regional Office. EPA planned this site visit to determine if, based on design, operating, and location considerations, they may join DER in denying the facilities Part B permit application. The attached report contains a summary of the site visit and followup meeting.

I. Site Visit

A. Background

The Raymark Manheim facility is a manufacturer of friction materials, primarily clutch facings, brake segments and oil well lining.

The waste generated approximately 4 million pounds annually from grooving, grinding and drilling of facings and linings, conveyed through dust work to a collector and then from the collector to screw conveyors where water (about 2:1) is mixed with the waste to control release of airborne asbestos. The resultant slurry (about 30% solid) is hauled to the landfill.

The landfill includes two parts, the inactive part is covered with a finished asphalt. The active part has three trenches, approximately 10'x50'x20' each in size. Those trenches, where the waste slurry is disposed, have neither linings nor leachate collection systems. The landfill site underlies an alluvial deposit and a carbonate bedrock. The ground water level measurements showed that the site is under water table conditions and is hydraulically connected to the underlying limestone aquifer.

A fault has been identified east of the Raymark plant and projected onto the plant approximately 500 feet south of the landfill area. The plant production wells have been located along this fault.

B. Site Visit Findings

A tour of the facility included the landfill, monitoring, wells, storage area and old landfill area. HNu readings and photographs were taken at each of the various areas. HNu readings were detected in sinkholes around the landfill, indicating that volatiles may be escaping from the landfill. A drum storage area containing a vegetation stress spot (about 1 sq. foot) near the storage area detected significantly high HNu readings. It was also noted that some cracks in the asphalt cover of the old landfill portion were developing.

C. Conclusions

1. The design, operation, and environmental setting of the landfill indicates the potential for waste to seep into the ground water.
2. A major concern is contamination of lead, asbestos and spent solvents, although analytical results have not shown any elevated lead levels thus far.
3. The monitoring program should include an analysis of asbestos in the ground water and surface water. If the contamination is found in the samples, an extensive investigation of the drinking water nearby the site should be performed.

4. Due to inconsistent records in ground water elevations in well #6, further hydrogeological investigation is needed to define the ground water flow pattern.

II. Followup Meeting

A. Background

DER has expressed its intentions to deny Raymark's Part B permit application, and will be issuing a public notice in the coming weeks. The denial is based on the State requirements for a double liner system at all existing landfills. Raymark's variance request for this requirement was rejected due to the fact that the facility could not show equivalent protection with no liner.

A meeting in Harrisburg on July 24, 1985, was held to discuss the previous day's site visit, and the present and future status of Raymark's Part B permit application.

B. Meeting Discussions

Initial discussions focused on the previous day's site visit. C.K. Lee expressed his concerns regarding the contaminated soil adjacent to the storage area, and the facility has agreed to dig it up. C.K. also informed the facility that they need to further investigate the hydrogeologic pattern underlying the landfill in light of discrepancies in ground water levels reported in well number 6.

Next, Dennis Weller, a Raymark representative, handed out ^(See Attachment 1) a proposal to close out the landfill over the next three years while developing waste recycling, reduction, and detoxification programs. He further stated the facility's interest in entering into a Consent Agreement for extended closure with DER. The State expressed some willingness to enter into an agreement.

Sam Israel explained that if EPA followed the State and denied Raymark's Part B application, the facility may not be able to continue operating without interim status, and may have to begin closure immediately. Susan Giordano, of Raymark's corporate office, expressed concern that if the facility was forced to close the landfill at this time, the company couldn't absorb the financial burden of removing the waste offsite and would have to go out of business.

C. Conclusions

1. EPA may be able to follow the State and deny the permit application.
2. DER will likely enter into a consent agreement with the facility for extended closure.
3. Raymark will continue to respond to EPA's request for additional Part B information, although DER will definitely be denying its application.
4. If EPA denied the Part B, and the State entered into a consent agreement with Raymark for extended closure, the facility will likely be operating illegally, without interim status or a permit.

Attachment 1

DRAFT

Raymark, Inc., Industrial Division, located at 123 E. Stiegel Street, Manheim, PA 17545, currently operates a hazardous waste landfill on-site. The landfill operates under interim status. A complete Part B application has been accepted by and received by the Pennsylvania Department of Environmental Resources (PA DER). PA DER will not grant a permit to operate the facility under Part B RCRA due to Part B design deficiencies and evidence of sulfate (non-hazardous) migration.

Raymark recognizes the prohibitive cost in both time and capital to either correct the design deficiencies or construct a new facility meeting RCRA Part B Design criteria. Raymark also recognizes the environmental and business value of reducing the amount of hazardous waste generated requiring subsequent disposal. Therefore, Raymark proposes to enter into a consent agreement with PA DER to close the hazardous waste disposal facility at its Manheim location by November 1988.

The hazardous waste disposed on-site is lead bearing waste generated from the production of friction products, primarily clutch facings and brake lining. The waste is generated primarily through off-grade production and design (grinding requirements). Lead, the sole hazardous constituent is not contained in all products.

In order to effectively manage down the amount of hazardous waste generated, Raymark is or will be focusing on the following fronts:

- (1) Reducing/eliminating lead as a product raw material.
- (2) Re-engineering production methods to reduce design waste.
- (3) Development of products to recycle waste as a raw material.
- (4) Determining most cost effective method to render resultant hazardous waste non-hazardous.
- (5) Evaluate feasibility of constructing a secure landfill (non-hazardous) on-site.

More detail on each of the five preceding topics follows:

I. Reducing/Eliminating lead as a raw material.

Scope: Historically, lead has been a necessary raw material for compounding friction materials.

For several years, new products developed for manufacturing at this facility have been formulated with lead substitutes. This work continues and, in fact, we have experienced an overall decrease in the amount of lead used in manufacturing.

Two obstacles exist in the current manufacturing/business environment. One is that both lead-containing and lead-free products pass through the same manufacturing equipment. This results in a co-mingling of lead bearing and lead-free grinding waste with the resultant mixture exceeding

the hazardous waste classification. This grinding waste accounts for nearly 50 percent of the hazardous waste disposed on-site. It is cost prohibitive to construct parallel manufacturing operations to process either lead-bearing or lead-free products. Likewise, our market does not allow for selective manufacturing. The second obstacle is that several lead-bearing products are sold in markets that are either reluctant to change product formulations and/or require an extremely lengthy approval period. Gaining formulation change approvals for original equipment automotive, off-highway, and industrial applications can require at least 18 months.

Estimated time period required: 2 years minimum

II. Re-engineered production to reduce design waste

Scope: The products manufactured require dimensional conformance to rather tight tolerances, especially given the materials of construction for the products. To achieve final product specifications our products are made oversized, with subsequent machining operations effecting a product to specification. Several programs have been carried through completion to reduce the initial oversize condition of our products. Significant work in this area remains to be done. However, minimization of material used in initial product forming

will require several hundreds of thousand dollars in tooling and equipment costs.

Estimated time period required: 2 years

III. Development of products to recycle waste as a new material:

Scope: Work in this area is in the infant stage. However, some promising results have been obtained. Efforts are continuing to develop efficient processes and procedures. Once an efficient process has been determined, efforts will begin to develop a market for these new products.

Estimated time period: 3 years

IV. Rendering Resultant hazardous waste non-hazardous:

After on-site hazardous waste disposal activity ends, the subject waste will need to be disposed in an approved facility off-site. There are no hazardous waste facilities within a reasonable distance of our plant. At current generation rates, our disposal costs could exceed \$30M per day. Our business cannot absorb this cost. It may be more effective to chemically fix any remaining waste to render it non-hazardous. This action provides the option of disposal in an approved secure landfill. Discussions and passage of information has started between Raymark and ChemFix and SolidTek Systems.

V. Constructing a non-hazardous secure landfill on-site:

In conjunction with Item IV, it may be in Raymark's best interest to construct a secure landfill on-site or on adjoining land. Investigative work on this area has not started. I have been told the approval period may be as long as 1-1/2 years for a second landfill. Design, evaluation, and construction would increase this time period.

Estimated time period: 2-1/2 - 3 years

In Raymark's opinion, an important consideration of this matter should be the fact that no statistical evidence shows a migration of a hazard constituent from the present landfill. The landfill has been in operation for well over 10 years. The purpose of the regulations is to protect the environment and the public welfare. Any abrupt closing of our facility would have a crippling effect on an already weakened business.

It is Raymark's intent to pursue each of the five areas presented. Estimated time periods are given for each area as a stand-alone project. Several of these areas will be relying on common sources of technical support. For this reason we do not expect satisfactory completion of the five-point program until 3 years from now. In the meantime, we wish to use and maintain our on-site hazardous landfill, with closure occurring prior to November 1988.

Your comments and concern on this matter are requested.

D.A. WELLER

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

DATE: JUL 25 1985

SUBJECT: RCRA Inspection **RAYMARK INDUSTRIES**
DAD 0030 153 28

FROM: Joseph S. Arena ^{SA}
Environmental Scientist (3HW11)

TO: File

THRU: Peter W. Schaul, Chief
RCRA Enforcement Section (3HW11)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY
REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS
REQUIRED AT THIS TIME.

Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Solid Waste Management

PAD003015328
I.D. Number

8/85
Prepared

Hazardous Waste Management

Facility Inspection Checklist for Compliance with Interim
Status Standards Covering Ground-Water Monitoring
(Form 4)

ity Name	<u>Raymark</u>	Facility Permit Number	<u>some 33 10</u>
ity	<u>Lebanon</u>	Municipality	<u>Manheim</u>
pany Address	<u>123 E. Stiegel St.</u>	Inspector's Name	<u>T.J. Miller</u>
	<u>Manheim, Pa. 17545</u>		
pany Contact/Official	<u>George Hauser</u>	Branch/Organization	<u>PRDER / BSWM</u>
	<u>Manager, Plant Eng.</u>	Date of Inspection	<u>6/28/85</u>

of facility: (check appropriately)	<u>Yes</u>	<u>No</u>	<u>Unknown</u>
a) surface impoundment	<u> </u>	<u> </u>	<u> </u>
b) landfill	<u> </u>	<u> </u>	<u> </u>
c) land treatment facility	<u> </u>	<u> </u>	<u> </u>
d) disposal waste pile*	<u> </u>	<u> </u>	<u> </u>

nd-Water Monitoring Program

Was the ground-water monitoring program reviewed prior to site visit? If "No",	<u> </u>	<u> </u>	<u> </u>
---	-----------	-----------	-----------

a) Was the ground-water program reviewed at the facility prior to site inspection?	<u> </u>	<u> </u>	<u> </u>
---	-----------	-----------	-----------

Has a ground-water monitoring program (capable of determining the facility's impact on the quality of any ground-water system which the facility has the potential to affect, or as otherwise deemed necessary by the Department) been implemented? 75.265(n)(1)	<u> </u>	<u> </u>	<u> </u>
---	-----------	-----------	-----------

Has at least one monitoring well been installed hydraulically upgradient from the limit of the waste management area? 75.265(n)(3)(i)	<u> </u>	<u> </u>	<u> </u>
---	-----------	-----------	-----------

a) Are ground-water samples from the upgradient well representative of background ground-water quality and not affected by the facility (as ensured by proper well number, locations, and depths)?	<u> </u>	<u> </u>	<u> </u>
---	-----------	-----------	-----------

Listed separate from landfill for convenience of identification.

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	<u>Yes</u>	<u>No</u>	<u>Unknown</u>
Have at least three monitoring wells been installed hydraulically downgradient at the perimeter of the waste management area? 75.265(n)(3)(ii)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Do well number, locations, and depths ensure prompt detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the groundwater?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have the locations of the monitoring wells been approved by the Department? 75.265(n)(3)(iii)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Have the locations of the waste management areas been verified to conform with information in the ground-water program?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) If the facility contains multiple waste management components, is each component adequately monitored?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Do the numbers, locations, and depths of the ground-water monitoring wells agree with the data in the ground-water monitoring system program? (If "No", explain discrepancies on an attachment.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Well completion details: 75.265(n)(5) and 75.265(n)(6)			
a) Are wells properly cased?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Are annular spaces properly sealed to prevent contamination of samples and the ground water?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has a ground-water sampling and analysis plan been developed? 75.265(n)(7)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Has it been followed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the plan kept at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the plan include procedures and techniques for:			
1) Sample collection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Sample preservation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Sample shipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4) Analytical procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5) Chain of custody control?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

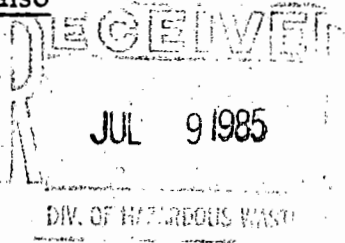
JUL 9 1985

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>
Are the required parameters in ground-water samples being tested quarterly for the first year? 75.265(n)(8) and 75.265(n)(9)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Are the ground-water samples analyzed for the following:			
1) Parameters characterizing the suitability of the ground-water as a drinking water supply? 75.265(n)(8)(i)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Parameters establishing ground-water quality? 75.265(n)(8)(ii)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Parameters used as indicators of ground-water contamination? 75.265(n)(8)(iii)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(i) Has provision been made for the establishment of initial background concentrations of all parameters in all monitoring wells quarterly during the first year? 75.265(n)(9)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(ii) For each indicator parameter, are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 75.265(n)(10)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iii) Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 75.265(n)(10)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) For facilities which have completed first year ground-water sampling and analysis requirements:			
1) Have samples been obtained and analyzed for the ground-water quality parameters at least semi-annually? 75.265(n)(11)(i)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Have samples been obtained and analyzed for the indicators of ground-water contamination at least quarterly? 75.265(n)(11)(ii)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Were ground-water surface elevations determined at each monitoring well each time a sample was taken? 75.265(n)(12)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Were the ground-water surface elevations evaluated at least annually (by January 31) to determine whether the monitoring wells are properly constructed? 75.265(n)(17)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

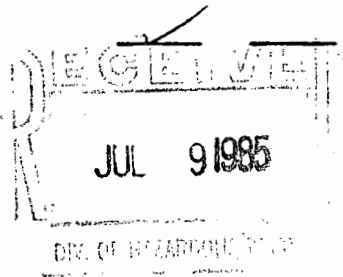
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	<u>Yes</u>	<u>No</u>	<u>Unknown</u>
e) If it was determined that modification of the number, location, or depth of monitoring wells was necessary, was the system brought into compliance with 75.265(n)(3)? 75.265(n)(17)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Prior to any construction modification, were any proposed changes approved in writing by the Department? 75.265(n)(17)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has an outline of a ground-water quality assessment and abatement program been prepared? 75.265(n)(13)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Does it describe a program capable of the following:			
1) Determining which hazardous waste or hazardous waste constituents have entered the ground water? 75.265(n)(13)(i)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Determining the rate and extent of migration of hazardous waste or hazardous waste constituents in ground water? 75.265(n)(13)(ii)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Determining concentrations of hazardous waste or hazardous waste constituents in ground water? 75.265(n)(13)(iii)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4) Abating any ground-water contamination attributable to the hazardous waste management facility? 75.265(n)(13)(iv)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) After the first year of monitoring, have at least four replicate measurements of each indicator parameter been obtained for samples taken from each well monitored? 75.265(n)(14)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1) Were the results compared with the initial background means from the upgradient well(s) determined during the first year?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(i) Was each well considered individually?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(ii) Was the Student's t-test used (at the 0.01 level of significance)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Was a significant increase (or pH decrease as well) found in the:			
(i) Upgradient wells	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(ii) Downgradient wells	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If "Yes", Hazardous Waste Management Form 5 must also be completed.



	Yes	No	Unknown
Have records been kept of the analyses required in paragraphs 75.265(n)(9) through 75.265(n)(11)? 75.265(n)(18)(i)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Have records been kept of ground-water surface elevations taken at the time of sampling for each well (75.265(n)(12))? 75.265(n)(18)(i)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Have records been kept of required elevations in indicator parameters (75.265(n)(14))? 75.265(n)(18)(i)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has the following ground-water information been reported to the Department: 75.265(n)(18)(ii)			
(a)(i) During the first year, initial background concentrations of parameters listed in 75.265(n)(8)(i) within 15 days after completing each quarterly analysis required during the first year?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(ii) For each well, have any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplies been separately identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)(i) Semi-annual measurements of the parameters establishing ground-water quality (75.265(n)(8)(ii)) for each ground-water monitoring well taken at the end of the first (April 1) and third (October 1) quarters?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(ii) Have any significant differences from the initial background found in the wells been separately identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iii) Has this information been submitted as part of the quarterly report (75.265(m)) for those facilities receiving hazardous waste from off-site sources?	<input type="checkbox"/>	N/A	<input type="checkbox"/>
(c)(i) Quarterly measurement of the parameters used as indicators of ground-water contamination (75.265(n)(8)(iii)) and the required evaluations of these parameters under 75.265(n)(14)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(ii) Have any significant differences from initial background found in the upgradient wells been separately identified and included in the quarterly submission?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d)(i) Quarterly results of the evaluation of ground-water surface elevations under 75.265(n)(17)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(ii) If applicable, has a description of the response to that evaluation been included?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



-SWM-88:2/83

Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Solid Waste Management

PAD 003015328
I.D. Number

6/28/85
Date Prepared

Hazardous Waste Management

Inspection Compliance Checklist for a Facility Which
May Be Affecting Ground-Water Quality
(Form 5)

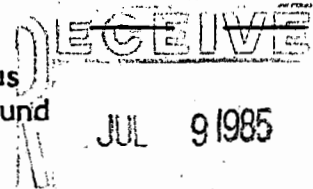
Facility Name Raymark Facility Permit Number same as ID.
County Lancaster Municipality Manheim
Company Address 123 E. Stiegel St. Inspector's Name T.J. Miller
Manheim, Pa. 17345
Company Contact/Official George Houser Branch/Organization PADER / BSWM
Title Mgr. Plant Eng. Date of Inspection 6/28/85

Type of facility: (check appropriately)	Yes	No	Unknown
a) surface impoundment			
b) landfill	<input checked="" type="checkbox"/>		
c) land treatment facility			
d) disposal waste pile			
Have comparisons of ground-water contamination indicator parameters (75.265(n)(8)(iii)) for the upgradient well(s) shown a significant increase (or pH decrease as well) over initial background? 75.265(n)(14)(i)			
	<input checked="" type="checkbox"/>		
a) If "Yes", has this information been submitted to the Department according to 75.265(n)(18)(ii)(B)?	<input checked="" type="checkbox"/> *		
Have comparisons of indicator parameters for the downgradient wells (75.265(n)(8)(iii)) shown a significant increase (or pH decrease as well) over initial background? 75.265(n)(14)(ii)			
	<input checked="" type="checkbox"/>		
a) If "Yes", were additional ground-water samples taken for those downgradient wells where the significant difference was determined? 75.265(n)(14)(ii)	<input checked="" type="checkbox"/>		
1) Were samples split in two?		<input checked="" type="checkbox"/>	
2) Was the significant difference due to human (e.g., laboratory) error? If "Yes", do not continue.		<input checked="" type="checkbox"/>	

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* original background well determined to have an external

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>
d) Was it determined that hazardous waste or hazardous waste constituents from the facility have entered the ground water?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1) If "No", was the original indicator evaluation program, required by 75.265(n)(7) - 75.265(n)(12) and 75.265(n)(14), reinstated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Was the Department notified of the reinstatement of program within 15 days of the determination? 75.265(n)(15)(v)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) If it was determined that hazardous waste or hazardous waste constituents have entered the ground water (75.265(n)(15)(vi)):			
1) For facilities where the program was implemented prior to final closure, are determinations of hazardous waste or hazardous waste constituents continued on a quarterly basis?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(If the program was implemented during the post-closure care period, determinations made in accordance with the ground-water quality assessment plan may cease after the first determination.)			
(a) Were subsequent ground-water quality reports submitted to the Department within 15 days of determination?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Has an approvable abatement plan, to be used to abate the ground-water contamination, been developed and submitted to the Department?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Were records kept of the analyses and evaluations, specified in the ground-water quality assessment (throughout the active life of the facility)? 75.265(n)(19)(i)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(a) If a disposal facility, were(are) records kept throughout the post-closure period as well?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Are annual reports being submitted to the Department by January 31, which contain the results of the ground-water quality assessment program? 75.265(n)(19)(ii)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1) Do the reports include the calculated or measured rate of migration of hazardous waste or hazardous waste constituents in the ground water during the reporting period?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Do the reports include the measured volumes of hazardous waste or hazardous waste constituents removed from ground water using the abatement procedures specified in 75.265(n)(15)(vi)(C)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Additional Information.

1) the date on the 1st Quarter, 1985 report is in error. A corrected sheet is to be submitted which contains the w.l. elevation as well as a which was for 1 1 1.

2) Mr. Dennis Weller of Raymark will contact Mr. Sam Israel of U.S. EPA in order to schedule a meeting to discuss issues pertaining to Raymarks LE. A letter NOD/NOV was sent by EPA to Raymark concerning the facility's Part B application.

The P2OER intends to deny Raymarks Pt B applic and variance request for the landfill due to failure to provide equivalent protection for the groundwater. It seems pointless to respond to EPA's NOD/NOV without coordination among the regulatory agencies to set priorities for Raymark.

The meeting should occur prior to the date established by EPA for response to its Notice

3) Settlement cracks in the drum accumulation struct will be addressed by Raymark (AOP).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

DATE: JUL 25 1985

SUBJECT: RCRA Inspection *RAYMARK INDUSTRIES*
DAD 002015328

FROM: Joseph S. Arena *SA*
Environmental Scientist (3HW11)

TO: File

FOR: Peter W. Schaul, Chief
RCRA Enforcement Section (3HW11)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY
REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS
REQUIRED AT THIS TIME.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF SOLID WASTE MANAGEMENT

Maj. TSD

INSPECTION REPORT

Site ID # PAD 003015 32B License # _____
Site Name: RAYMARK INDUSTRIES Phone # (717) 665-2211 EXT 372
Address 123 E STIEGEL STREET
City 1 MANHEIM State PA Zip Code 17545
Municipality MANHEIM CITY County LANCASTER
Responsible Official CEAIG R. SMITH Title PRESIDENT + GEN. MGR, IND. DIV.
Person Interviewed GEORGE R. HOUSEL Title PROJECT ENGINEER
Inspector ARTHUR L. DALLA PIAZZA + THOMAS MILLER

Inspection Type (Generator Only)

<input checked="" type="checkbox"/> 01 Routine	<input type="checkbox"/> 11 Part B	<input type="checkbox"/> 51 Routine	<input checked="" type="checkbox"/> Hazardous	<input type="checkbox"/> Treatment
<input type="checkbox"/> 04 Follow Up	<input type="checkbox"/> 12 Complaint	<input type="checkbox"/> 54 Follow Up	<input type="checkbox"/> Residual	<input type="checkbox"/> Storage
<input type="checkbox"/> 05 Crit Stage	<input type="checkbox"/> 13 Withdrawn	<input type="checkbox"/> 56 Sample	<input type="checkbox"/> Municipal	<input checked="" type="checkbox"/> Disposal
<input type="checkbox"/> 06 Sample Only	<input type="checkbox"/> 14 Closure	<input type="checkbox"/> 60 Survey		<input checked="" type="checkbox"/> Generator
<input type="checkbox"/> 07 Permitting	<input type="checkbox"/> 15 Post Closure	<input type="checkbox"/> 62 Complaint		<input type="checkbox"/> Processing
<input type="checkbox"/> 08 Superfund	<input type="checkbox"/> 50 Record Rev	<input type="checkbox"/> 70 Record Rev		<input type="checkbox"/> Surface App
<input type="checkbox"/> 09 Ground Water	<input type="checkbox"/> 99 Other	<input type="checkbox"/> 98 Other		<input type="checkbox"/> Transporter
<input type="checkbox"/> 10 Survey				

Site ID # PAD003015328 On-Site Start Time 10:40 AM
On-Site End Time 11:50 AM
On-Site Total Time 1 HR 10 MIN

Due Date	Inspection Date	Type	Inspector ID #	# Violation	Enforcement
<u>06/28/85</u>	<u>06/28/85</u>	<u>01</u>	<u>2306</u>	<u>00</u>	<u>00</u>

Comment ROUTINE INSPECTION

Sample # Low Sample # High

Monitoring Points Sampled

<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

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DIV. OF ENVIRONMENTAL RESOURCES

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

RANGE FUS		REQUIREMENT	PAD 003015 328 06-28-85	CHAPTER CITATION
3	4			75.262
		Identification number		(c) (1)
		Hazardous waste shipments offered only to licensed transporters		(c) (4)
X		Authorization received from TSD facility for wastes shipped off-site		(d)
X		PA manifest used for intrastate shipments		(e) (1) (i)
		Disposer state manifest or EPA format manifest used for out-of-state shipments		(e) (1) (iii)
		Manifests filled out properly and completely		(e) (1)
		Manifests routed properly and within time limits (24 hours)		(e) (2)
		Proper U.S. DOT shipping containers or packages		(f) (1) (i)
		Shipping containers marked and labeled according to U.S. DOT		(f) (1) (ii)
		Containers of 110 gal. or less marked with required PA label		(f) (1) (iii)
X		Placards offered to transporter		(f) (2)
		Wastes accumulated on-site for less than 90 days		(g) (1)
		Wastes stored in proper containers and properly marked and labeled		(g) (1) (ii)
		Containers managed in accordance with 75.265(g)		(g) (1) (iii)
		Containers clearly marked with accumulation date and visible for inspection		(g) (1) (iv)
		Records retained at designated location for 20 years		(h)
		Quarterly reports submitted to the Department		(i)
		Exception reporting procedures followed		(j)
X		Hazardous waste disposal plan, if required		(l)
		Spill reporting procedures followed		(m) (1)
		Preparedness, Prevention and Contingency Plan approved and implemented		(m) (5)
X		Special requirements followed for international shipments		(o)

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

ANCE US	3	4	REQUIREMENT	PAD003015328 06-28-85	CHAPTER CITATION
			Containers managed to prevent leaks and spills		(q) (1), (4)
			Containers are compatible with waste stored.		(q) (2)
			Containers are closed during storage		(q) (3)
			Container storage area inspected weekly for leaks, deterioration, etc.		(q) (5)
			Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.		(q) (6)
			Satisfactory procedures followed for handling incompatible wastes.		(q) (7), (8)
			Incompatible wastes separated or protected from other materials.		(q) (9)
			Containers and tanks labeled to identify accurately hazardous waste contained.		Act 97 Section 403(b) (2)
			Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material		(r) (2)
			Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.		(r) (3)
			Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.		(r) (4)
			Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.		(r) (4)
			Continuously fed tanks equipped with a means to stop the inflow.		(r) (5)
			Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.		(r) (6)
			Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.		(r) (7)
			Discharge control equipment inspected once each operating day.		(r) (8) (i)
			Monitoring equipment data inspected once each operating day.		(r) (8) (ii)
			Liquid level of tanks inspected once each operating day.		(r) (8) (iii)
			Construction materials of tanks inspected weekly.		(r) (8) (iv)
			Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.		(r) (8) (v)
			All hazardous waste removed from tanks and related appurtenances at closure.		(r) (9)
			Placement of ignitable or reactive waste only with the Department's approval		(r) (10)
			Covered tanks in which ignitable or reactive waste is treated or stored meets NEPA buffer zone requirements.		(r) (11)
			Precautions taken for handling ignitable, reactive or incompatible waste or material.		(r) (12), (13)

75.265

[illegible]

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

of Inspection 06-28-85 Identification Number PAD 003015328

ny, Installation Name RATMAEK INDUSTRIES

y LANCASTER Municipality MANHEIM

ROUTINE GENERATOR, TSD DISPOSAL INSPECTIONS TOGETHER WITH
A GROUND WATER MONITORING EVALUATION, NO OPERATIONAL
DISCREPANCIES WERE NOTED DURING INSPECTION.

inspection report is official notification that a representative of the Department of
onmental Resources, Bureau of Solid Waste Management, inspected the above installation.
indings of this inspection are shown in this report. Any violations which were uncovered
g the inspection are indicated. Violations may also be discovered upon examination of
esults of laboratory analyses and review of Department records. Notification will be
coming, confirming any violations indicated herein and listing any additional violations.

n Interviewed (signature) George L. Houser

Date 6/28/85

ctor (signature) Arthur P. D. P. P. P.

Date 28-85

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.

Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection - ~~Reported~~ - *Manheim, Pa.*

DATE: 3/6/85

FROM: *gkc* Gregory A. Koltonuk, Environmental Scientist
RCRA Enforcement Section (3HW11)

TO: File

Thru: Peter W. Schaul, Chief
RCRA Enforcement Section (3HW11)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY
REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS
REQUIRED AT THIS TIME.

Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Solid Waste Management

PAD 003015328
I.D. Number

12/14/84
Report Prepared

Hazardous Waste Management

Facility Inspection Checklist for Compliance with Interim
Status Standards Covering Ground-Water Monitoring
(Form 4)

Facility Name	<u>Raymark</u>	Facility Permit Number	<u>300628 (I.W. #)</u>
County	<u>Lancaster</u>	Municipality	<u>Manheim</u>
Company Address	<u>123 E. Stiegel St.</u>	Inspector's Name	<u>T.J. Miller</u>
	<u>Manheim, Pa. 17545</u>		<u>George Houser</u>
Company Contact/Official	<u>George Houser</u>	Branch/Organization	<u>PADER / BSWM</u>
	<u>Env't. Coordinator</u>	Date of Inspection	<u>12/14/84</u>

Type of facility: (check appropriately)

- a) surface impoundment
- b) landfill
- c) land treatment facility
- d) disposal waste pile*

Yes No Unknown

<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>

Ground-Water Monitoring Program

Was the ground-water monitoring program reviewed prior to site visit?
If "No",

<u> </u>	<u> </u>	<u> </u>
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a) Was the ground-water program reviewed at the facility prior to site inspection?

<u> </u>	<u> </u>	<u> </u>
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Has a ground-water monitoring program (capable of determining the facility's impact on the quality of any ground-water system which the facility has the potential to affect, or as otherwise deemed necessary by the Department) been implemented? 75.265(n)(1)

<u> </u>	<u> </u>	<u> </u>
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Has at least one monitoring well been installed hydraulically upgradient from the limit of the waste management area?
75.265(n)(3)(i)

<u> </u>	<u> </u>	<u> </u>
-----------	-----------	-----------

a) Are ground-water samples from the upgradient well representative of background ground-water quality and not affected by the facility (as ensured by proper well number, locations, and depths)?

<u> </u>	<u> </u>	<u> </u>
-----------	-----------	-----------

Listed separate from landfill for convenience of identification.

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>
Have at least three monitoring wells been installed hydraulically downgradient at the perimeter of the waste management area? 75.265(n)(3)(ii)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Do well number, locations, and depths ensure prompt detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the groundwater?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have the locations of the monitoring wells been approved by the Department? 75.265(n)(3)(iii)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Have the locations of the waste management areas been verified to conform with information in the ground-water program?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) If the facility contains multiple waste management components, is each component adequately monitored?	<input type="checkbox"/>	<u>N/A</u>	<input type="checkbox"/>
Do the numbers, locations, and depths of the ground-water monitoring wells agree with the data in the ground-water monitoring system program? (If "No", explain discrepancies on an attachment.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Well completion details: 75.265(n)(5) and 75.265(n)(6)			
a) Are wells properly cased?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Are annular spaces properly sealed to prevent contamination of samples and the ground water?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has a ground-water sampling and analysis plan been developed? 75.265(n)(7)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Has it been followed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the plan kept at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the plan include procedures and techniques for:			
1) Sample collection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Sample preservation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Sample shipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4) Analytical procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5) Chain of custody control?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

JAN - 9 1985

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>
Are the required parameters in ground-water samples being tested quarterly for the first year? 75.265(n)(8) and 75.265(n)(9)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Are the ground-water samples analyzed for the following:			
1) Parameters characterizing the suitability of the ground-water as a drinking water supply? 75.265(n)(8)(i)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Parameters establishing ground-water quality? 75.265(n)(8)(ii)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Parameters used as indicators of ground-water contamination? 75.265(n)(8)(iii)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(i) Has provision been made for the establishment of initial background concentrations of all parameters in all monitoring wells quarterly during the first year? 75.265(n)(9)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(ii) For each indicator parameter, are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 75.265(n)(10)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iii) Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 75.265(n)(10)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) For facilities which have completed first year ground-water sampling and analysis requirements:			
1) Have samples been obtained and analyzed for the ground-water quality parameters at least semi-annually? 75.265(n)(11)(i)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Have samples been obtained and analyzed for the indicators of ground-water contamination at least quarterly? 75.265(n)(11)(ii)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Were ground-water surface elevations determined at each monitoring well each time a sample was taken? 75.265(n)(12)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Were the ground-water surface elevations evaluated at least annually (by January 31) to determine whether the monitoring wells are properly constructed? 75.265(n)(17)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>
e) If it was determined that modification of the number, location, or depth of monitoring wells was necessary, was the system brought into compliance with 75.265(n)(3)? 75.265(n)(17)	_____	N/A	_____
f) Prior to any construction modification, were any proposed changes approved in writing by the Department? 75.265(n)(17)	✓	_____	_____
g) Has an outline of a ground-water quality assessment and abatement program been prepared? 75.265(n)(13)	✓	_____	_____
a) Does it describe a program capable of the following:			
1) Determining which hazardous waste or hazardous waste constituents have entered the ground water? 75.265(n)(13)(i)	✓	_____	_____
2) Determining the rate and extent of migration of hazardous waste or hazardous waste constituents in ground water? 75.265(n)(13)(ii)	✓	_____	_____
3) Determining concentrations of hazardous waste or hazardous waste constituents in ground water? 75.265(n)(13)(iii)	✓	_____	_____
4) Abating any ground-water contamination attributable to the hazardous waste management facility? 75.265(n)(13)(iv)	_____	_____	✓
b) After the first year of monitoring, have at least four replicate measurements of each indicator parameter been obtained for samples taken from each well monitored? 75.265(n)(14)	✓	_____	_____
1) Were the results compared with the initial background means from the upgradient well(s) determined during the first year?	✓	_____	_____
(i) Was each well considered individually?	✓	_____	_____
(ii) Was the Student's t-test used (at the 0.01 level of significance)?	✓	_____	_____
2) Was a significant increase (or pH decrease as well) found in the:			
(i) Upgradient wells	✓	_____	_____
(ii) Downgradient wells	✓	_____	_____

If "Yes", Hazardous Waste Management Form 5 must also be completed.

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>
Have records been kept of the analyses required in paragraphs 75.265(n)(9) through 75.265(n)(11)? 75.265(n)(18)(i)	<u>✓</u>	<u> </u>	<u> </u>
Have records been kept of ground-water surface elevations taken at the time of sampling for each well (75.265(n)(12))? 75.265(n)(18)(i)	<u>✓</u>	<u> </u>	<u> </u>
Have records been kept of required elevations in indicator parameters (75.265(n)(14))? 75.265(n)(18)(i)	<u>✓</u>	<u> </u>	<u> </u>
Has the following ground-water information been reported to the Department: 75.265(n)(18)(ii)			
(a)(i) During the first year, initial background concentrations of parameters listed in 75.265(n)(8)(i) within 15 days after completing each quarterly analysis required during the first year?	<u>✓</u>	<u> </u>	<u> </u>
(ii) For each well, have any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplies been separately identified?	<u>✓</u>	<u> </u>	<u> </u>
(b)(i) Semi-annual measurements of the parameters establishing ground-water quality (75.265(n)(8)(ii)) for each ground-water monitoring well taken at the end of the first (April 1) and third (October 1) quarters?	<u>✓</u>	<u> </u>	<u> </u>
(ii) Have any significant differences from the initial background found in the wells been separately identified?	<u>✓</u>	<u> </u>	<u> </u>
(iii) Has this information been submitted as part of the quarterly report (75.265(m)) for those facilities receiving hazardous waste from off-site sources?	<u> </u>	<u>N/A</u>	<u> </u>
(c)(i) Quarterly measurement of the parameters used as indicators of ground-water contamination (75.265(n)(8)(iii)) and the required evaluations of these parameters under 75.265(n)(14)?	<u>✓</u>	<u> </u>	<u> </u>
(ii) Have any significant differences from initial background found in the upgradient wells been separately identified and included in the quarterly submission?	<u>✓</u>	<u> </u>	<u> </u>
(d)(i) Quarterly results of the evaluation of ground-water surface elevations under 75.265(n)(17)?	<u>✓</u>	<u> </u>	<u> </u>
(ii) If applicable, has a description of the response to that evaluation been included?	<u> </u>	<u>N/A</u>	<u> </u>

Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Solid Waste Management

PAD 003015328
I.D. Number

Hazardous Waste Management

Inspection Compliance Checklist for a Facility Which
May Be Affecting Ground-Water Quality
(Form 5)

Facility Name Raymark Facility Permit Number 300628 (I.W. #)
County Lancaster Municipality Manheim
Company Address 123 E. Stiegel St. Inspector's Name G. H. H. H.
Manheim, Pa. 17545 T.J. Miller
Company Contact/Official George H. H. Branch/Organization PEDER / BSWM
Title Env't. Coordinator Date of Inspection 12/19/84

Type of facility: (check appropriately)

- a) surface impoundment
b) landfill
c) land treatment facility
d) disposal waste pile

Yes No Unknown

Have comparisons of ground-water contamination indicator parameters (75.265(n)(8)(iii)) for the upgradient well(s) shown a significant increase (or pH decrease as well) over initial background? 75.265(n)(14)(i)

- a) If "Yes", has this information been submitted to the Department according to 75.265(n)(18)(ii)(B)?

Have comparisons of indicator parameters for the downgradient wells (75.265(n)(8)(iii)) shown a significant increase (or pH decrease as well) over initial background? 75.265(n)(14)(ii)

- a) If "Yes", were additional ground-water samples taken for those downgradient wells where the significant difference was determined? 75.265(n)(14)(ii)

- 1) Were samples split in two?
2) Was the significant difference due to human (e.g., laboratory) error? If "Yes", do not continue.

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>
If significant differences were not due to error, was a written notice sent to the Department within 7 days of confirmation? 75.265(n)(15)	_____	_____/_____* ₁	_____
Within 30 days of notification of the Department, was a certified ground-water quality assessment plan, based on the outline required by 75.265(n)(13), developed and submitted for approval? 75.265(n)(15)(i).	_____/_____* ₁	_____	_____
a) Does the plan specify 75.265(n)(15)(ii):			
1) well information (specifics)	_____/_____	_____	_____
(a) number?	_____/_____	_____	_____
(b) locations?	_____/_____	_____	_____
(c) size?	_____/_____	_____	_____
(d) depths?	_____/_____	_____	_____
2) sampling methods?	_____/_____	_____	_____
3) analytical methods?	_____/_____	_____	_____
4) evaluation procedures?	_____/_____	_____	_____
5) abatement procedures?	_____/_____	_____	_____
6) schedule of implementation?	_____/_____	_____	_____
b) Does the plan allow for determination of 75.265(n)(15)(iii):			
1) Rate and extent of migration of hazardous waste or hazardous waste constituents in the ground water?	_____/_____	_____	_____
2) Concentrations of the hazardous waste or hazardous waste constituents in the ground water?	_____/_____	_____	_____
c) Is it indicated that the first determination was made as soon as technically feasible? 75.265(n)(15)(iv)	_____/_____	_____	_____
1) Within 15 days after the first determination, was a written report containing the assessment of ground-water quality submitted to the Department?	_____	_____/_____* ₂	_____

*₁ Discussions with the Corporation had resulted in notification by the DER that significant differences existed and therefore the Groundwater Assessment Program must be implemented.

Page 2 of 3

*₂ First determination was made prior to completion of 1st quarter after the initial year of monitoring.

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>
d) Was it determined that hazardous waste or hazardous waste constituents from the facility have entered the ground water?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1) If "No", was the original indicator evaluation program, required by 75.265(n)(7) - 75.265(n)(12) and 75.265(n)(14), reinstated?	<input type="checkbox"/>	<u>N/A</u>	<input type="checkbox"/>
a) Was the Department notified of the reinstatement of program within 15 days of the determination? 75.265(n)(15)(v)	<input type="checkbox"/>	<u>N/A</u>	<input type="checkbox"/>
e) If it was determined that hazardous waste or hazardous waste constituents have entered the ground water (75.265(n)(15)(vi)):			
1) For facilities where the program was implemented prior to final closure, are determinations of hazardous waste or hazardous waste constituents continued on a quarterly basis?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(If the program was implemented during the post-closure care period, determinations made in accordance with the ground-water quality assessment plan may cease after the first determination.)			
(a) Were subsequent ground-water quality reports submitted to the Department within 15 days of determination?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Has an approvable abatement plan, to be used to abate the ground-water contamination, been developed and submitted to the Department?	<input type="checkbox"/>	<input checked="" type="checkbox"/> *	<input type="checkbox"/>
2) Were records kept of the analyses and evaluations, specified in the ground-water quality assessment (throughout the active life of the facility)? 75.265(n)(19)(i)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(a) If a disposal facility, were(are) records kept throughout the post-closure period as well?	<input type="checkbox"/>	<u>N/A</u>	<input type="checkbox"/>
f) Are annual reports being submitted to the Department by January 31, which contain the results of the ground-water quality assessment program? 75.265(n)(19)(ii)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1) Do the reports include the calculated or measured rate of migration of hazardous waste or hazardous waste constituents in the ground water during the reporting period?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Do the reports include the measured volumes of hazardous waste or hazardous waste constituents removed from ground water using the abatement procedures specified in 75.265(n)(15)(vi)(C)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ANALYTICAL DATA
MONITORING WELLS
RAYMARK INDUSTRIES, INC. - MANHEIM, PENNSYLVANIA
YEAR: FOUR
QUARTER: ONE
SAMPLE DATE: MARCH 19, 1985

7/24/85
hand carried by George Hu

Parameter	BCM Sample No. Units	Well No. 3	Well No. 4	Well No. 6	Well No. 7	Well No. 9	Well No. 10A	Well No. 10B
		N505389	N505390	N505391	N505392	N505393	N505394	N505395
Water Table Elevation *		380.64	378.80	385.80	380.81	382.40	381.35	380.94
<u>INDICATOR PARAMETERS</u>								
pH	Standard Units	8.1	7.4	7.0	7.6	7.6	7.0	7.6
Specific Conductance	umhos/cm	3,150	1,860	1,970	1,060	467	2,050	2,520
Total Organic Carbon	mg/l	39	12	15	23	20	27	39
Total Organic Halides	ug/l	25.6	23.4	<20.0	<20.0	<20.0	<20.0	<20.0
<u>QUALITY PARAMETERS</u>								
Chloride	mg/l	42.0	23.7	5.5	18.6	12.1	7.6	15.6
Sodium	mg/l	160.0	94.3	5.20	35.6	5.20	24.7	78.0
Sulfate	mg/l	781.0	453.0	817.0	124.0	28.0	377.0	371.1
<u>ADDITIONAL PARAMETERS</u>								
Total Dissolved Solids	mg/l	2,420	1,490	1,740	648	257	1,560	1,730
Alkalinity as CaCO ₃ :								
Methyl Orange	mg/l	2,300.0	1,086.0	300.0	438.0	470.0	630.0	1,242.0
Phenolphthalein	mg/l	<1	<1	<1	<1	<1	<1	<1
Bicarbonate	mg/l	2,273.0	1,083.4	299.7	436.3	469.5	629.40	1,237.35
Hydroxide	mg/l	<1	<1	<1	<1	<1	<1	<1
Carbonate	mg/l	26.9	2.6	0.28	1.63	1.76	0.59	4.6
Free Carbon Dioxide	mg/l	36.1	54.4	59.9	218.2	23.59	125.88	618.7
Lead	mg/l	<0.002	<0.002	<0.002	0.002	0.007	0.003	0.013
Nitrogen, Ammonia	mg/l	1.44	<0.05	<0.05	<0.05	0.05	0.45	0.62
Nitrite as N	mg/l	0.01	<0.01	<0.01	<0.01	<0.10	<0.20	<0.20
Nitrate as N	mg/l	0.22	3.99	1.35	16.9	1.98	<2.0	<2.0
Phosphate	mg/l	0.08	<0.05	<0.05	<0.05	<0.05	0.13	<0.05
Potassium	mg/l	15.0	2.16	13.7	2.70	1.59	8.75	9.17
Calcium	mg/l	129	240	227	111	64.6	168	156
Magnesium	mg/l	313	81.5	174	30.8	12.7	168	269

Water Table Elevation Well No. 8 (3/19/85) - 380.83 feet

* Groundwater levels in feet above mean sea level

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.

Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection - *Raymark Industries*
Manheim, Pa.
PAD 003015328

DATE: *2/5/85*

FROM: *gk* Gregory A. Koltonuk, Environmental Scientist
RCRA Enforcement Section (3HW11)

TO: File

Thru: *[Signature]* Peter W. Schaul, Chief
RCRA Enforcement Section (3HW11)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE
VIOLATIONS.

Muga TSD



Current waste handling method:

- a. ☒ On-site ☐ treatment, ☒ storage, ☒ disposal
- b. ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim
- c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
- d. ☒ Off-site ☐ use, ☒ reuse, ☐ recycle, ☐ reclaim

a. 130,000 lb/quarter ~~kg./mo.~~ solvents (third Q DEC 2) 1994

b. _____ kg./yr.

D001 F003/F005 D008

Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part 1

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

CHANCE TOS		REQUIREMENT	CHAPTER CITATION
<u>3</u>	<u>4</u>		75.262
		Identification number	(c) (1)
		Hazardous waste shipments offered only to licensed transporters	(c) (4)
X		Authorization received from TSD facility for wastes shipped off-site <i>to NT</i>	(d)
X		PA manifest used for intrastate shipments	(e) (1) (i)
		Disposer state manifest or EPA format manifest used for out-of-state shipments	(e) (1) (iii)
		Manifests filled out properly and completely	(e) (1)
		Manifests routed properly and within time limits (24 hours)	(e) (2)
		Proper U.S. DOT shipping containers or packages	(f) (1) (i)
		Shipping containers marked and labeled according to U.S. DOT	(f) (1), (ii)
		Containers of 110 gal. or less marked with required PA label	(f) (1) (iii)
X		Placards offered to transporter	(f) (2)
		Wastes accumulated on-site for less than 90 days	(g) (1)
		Wastes stored in proper containers and properly marked and labeled	(g) (1) (i)
		Containers managed in accordance with 75.265(g)	(g) (1) (ii)
		Containers clearly marked with accumulation date and visible for inspection	(g) (1) (iv)
X		Records retained at designated location for 20 years.	(h)
		Quarterly reports submitted to the Department	(i)
		Exception reporting procedures followed <i>no exceptions reported</i>	(j)
X		Hazardous waste disposal plan, if required	(l)
		Spill reporting procedures followed <i>no spills reported</i>	(m) (1)
		Preparedness, Prevention and Contingency Plan approved and implemented	(m) (5)
X		Special requirements followed for international shipments	(o)

DEC 21 1984

HAZARDOUS WASTE INSPECTION REPORT
TSD Facilities - Part A

Date of inspection 12-19-84 Time start 10:00 Time finish 11:00
Name of inspector Greg Hender Tom Miller
Company, installation name Ragmark Industries
Location 123 E Stiegel St.
County Lancaster Municipality Marbleton
Identification number PAD003 015 328
Name of responsible official Craig R Smith
Title President and General Manager, J.A. Div.
Mailing address 100 Oakville Drive Trumbull CT 06611
Area code and phone no. 203 - 371 - 0101
Name of person interviewed George R Houser
Title Project Engineer
Mailing address (if different from above) 123 E Stiegel St. Marbleton PA
Area code and phone no. 717 - 665 - 2211 17545

Site characterization:

- a. ☐ Treatment - ☐ surface impoundments, ☐ chemical, ☐ physical, ☐ biological
b. ☒ Storage - ☒ containers, ☐ tanks, ☐ surface impoundments, ☐ waste piles
c. ☒ Disposal - ☐ land treatment, ☒ landfill, ☐ incineration, ☐ thermal treatment
d. ☐ Use, ☐ reuse, ☐ recycle, ☐ reclaim

Does the facility generate hazardous wastes? ☒ Yes ☐ No

Types of hazardous waste produced by Hazardous Waste Number:

D001 F005 D008
F003

Are hazardous wastes transported off-site by the facility? ☐ Yes ☐ No

DEC 21 1984

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

of Inspection 12-19-84 Identification Number PAB003015328
ny, Installation Name Ragman
y. Municipality

The mixed solvent wastestream (naphtha, heptane, and toluene and MEK) was manifested variously as F001/F005; F005; and F003/F005 and was reported on quarterly reports as D001/F001/F005; D001/F001/F003; and D001/F003/F005.

The F001 designation is incorrect and should not be used on manifest or quarterly report since chlorinated hydrocarbons are not contained in these waste streams.

Manifest # PAB00114403 was manifested to a Solvents Recovery Service in Southington Connecticut with a listed ID number of NJ D002 182897. This discrepancy was resolved by contacting facility. ID number should be CT D009717604.

Submission of a closure plan for DEC 1 1984 drum storage area which is now becoming an accumulation area was requested.

Inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. Findings of this inspection are shown in this report. Any violations which were uncovered by the inspection are indicated. Violations may also be discovered upon examination of results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Interviewed (signature) [Signature]

Date

12/19/84

Director (signature) [Signature]

Date

12-19-84

6-21-84

Date Prepared

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF SOLID WASTE MANAGEMENT

PADO3015328

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I.D. Number

Hazardous Waste Management

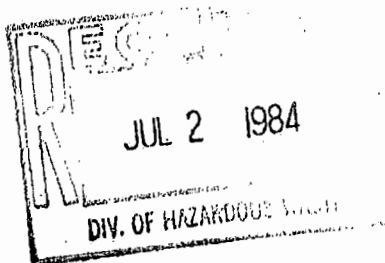
Facility Inspection Checklist for Compliance with
Interim Status Standards Covering Ground-Water Monitoring

FORM 4

Facility Name	<u>Raymark Industries</u>	Facility Permit Number	<u>IW 3 00628</u>
County	<u>Lancaster</u>	Municipality	<u>Manheim</u>
Company Address	<u>123 E. Stiegel St.</u> <u>Manheim PA 17545</u>	Inspector's Name	<u>GL Harder/TJM. Her</u>
Company Contact/Official	<u>George Houser</u>	Branch/Organization	<u>BSIWM/Pa DER</u>
Title	<u>Project Engineer</u>	Date of Inspection	<u>6-14-84</u>

Type of facility: (check appropriately)

- a) surface impoundment
b) landfill
c) land treatment facility
d) disposal waste pile*



Yes No Unknown

<u>X</u>		

Ground-Water Monitoring Program

Was the ground-water monitoring program reviewed prior to site visit?
If "No",

<u>X</u>		
----------	--	--

a) Was the ground-water program reviewed at the facility prior to
site inspection?

--	--	--

Has a ground-water monitoring program (capable of determining the
facility's impact on the quality of any ground-water system which the
facility has the potential to affect, or as otherwise deemed necessary
by the Department) been implemented? 75.265(n)(1)

<u>X</u>		
----------	--	--

Has at least one monitoring well been installed hydraulically upgra-
dient from the limit of the waste management area? 75.265(n)(3)(i)

<u>X</u>		
----------	--	--

a) Are ground-water samples from the upgradient well represen-
tative of background ground-water quality and not affected by
the facility (as ensured by proper well number, locations, and
depths)?

<u>X</u>		
----------	--	--

Listed separate from landfill for convenience of identification.

☒ Yes ☐ No ☐ Unknown

Have at least three monitoring wells been installed hydraulically downgradient at the perimeter of the waste management area? 75.265(n)(3)(ii)

☒

a) Do well number, locations, and depths ensure prompt detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the groundwater?

☒

b) Have the locations of the monitoring wells been approved by the Department? 75.265(n)(3)(iii)

☒

Have the locations of the waste management areas been verified to conform with information in the ground-water program?

☒

a) If the facility contains multiple waste management components, is each component adequately monitored?

☒

Do the numbers, locations, and depths of the ground-water monitoring wells agree with the data in the ground-water monitoring system program? (If "No", explain discrepancies on an attachment.)

☒

Well completion details: 75.265(n)(5) and 75.265(n)(6)

a) Are wells properly cased?

☒

b) Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths?

☒

c) Are annular spaces properly sealed to prevent contamination of samples and the ground water?

☒

Has a ground-water sampling and analysis plan been developed? 75.265(n)(7)

☒

a) Has it been followed?

☒

b) Is the plan kept at the facility?

☒

c) Does the plan include procedures and techniques for:

1) Sample collection?

☒

2) Sample preservation?

☒

3) Sample shipment?

☒

4) Analytical procedures?

☒

5) Chain of custody control?

☒

	Yes	No	Unknown
Are the required parameters in ground-water samples being tested quarterly for the first year? 75.265(n)(8) and 75.265(n)(9)	X		
a) Are the ground-water samples analyzed for the following:			
1) Parameters characterizing the suitability of the ground-water as a drinking water supply? 75.265(n)(8)(i)	X		
2) Parameters establishing ground-water quality? 75.265(n)(8)(ii)	X		
3) Parameters used as indicators of ground-water contamination? 75.265(n)(8)(iii)	X		
(i) Has provision been made for the establishment of initial background concentrations of all parameters in all monitoring wells quarterly during the first year? 75.265(n)(9)	X		
(ii) For each indicator parameter, are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 75.265(n)(10)	X		
(iii) Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 75.265(n)(10)	X		
b) For facilities which have completed first year ground-water sampling and analysis requirements:			
1) Have samples been obtained and analyzed for the ground-water quality parameters at least semi-annually? 75.265(n)(11)(i)	X		
2) Have samples been obtained and analyzed for the indicators of ground-water contamination at least quarterly? 75.265(n)(11)(ii)	X		
c) Were ground-water surface elevations determined at each monitoring well each time a sample was taken? 75.265(n)(12)	X		
d) Were the ground-water surface elevations evaluated at least annually (by January 31) to determine whether the monitoring wells are properly constructed? 75.265(n)(17)	X		
e) If it was determined that modification of the number, location, or depth of monitoring wells was necessary, was the system brought into compliance with 75.265(n)(3)? 75.265(n)(17)	X		
f) Prior to any construction modification, were any proposed changes approved in writing by the Department? 75.265(n)(17)	X		

	Yes	No	Unknown
0. Has an outline of a ground-water quality assessment and abatement program been prepared? 75.265(n)(13)	X		
a) Does it describe a program capable of the following:			
1) Determining which hazardous waste or hazardous waste constituents have entered the ground water? 75.265(n)(13)(i)	X		
2) Determining the rate and extent of migration of hazardous waste or hazardous waste constituents in ground water? 75.265(n)(13)(ii)	X		
3) Determining concentrations of hazardous waste or hazardous waste constituents in ground water? 75.265(n)(13)(iii)	X		
4) Abating any ground-water contamination attributable to the hazardous waste management facility? 75.265(n)(13)(iv)	X		
b) After the first year of monitoring, have at least four replicate measurements of each indicator parameter been obtained for samples taken from each well monitored? 75.265(n)(14)	X		
1) Were the results compared with the initial background means from the upgradient well(s) determined during the first year?	X		
(i) Was each well considered individually?	X		
(ii) Was the Student's t-test used at the appropriate level of significance (see Chapter 75, Subchapter D, Appendix III)?	X		
2) Was a significant increase (or pH decrease as well) found in the:			
(i) Upgradient wells	X		
(ii) Downgradient wells	X		
<i>If "Yes", Hazardous Waste Management Form 5 must also be completed.</i>			
Have records been kept of the analyses required in paragraphs 75.265(n)(9) through 75.265(n)(11)? 75.265(n)(18)(i)	X		
Have records been kept of ground-water surface elevations taken at the time of sampling for each well (75.265(n)(12))? 75.265(n)(18)(i)	X		
Have records been kept of required elevations in indicator parameters (75.265(n)(14))? 75.265(n)(18)(i)	X		

Yes

No

Unknown

4. Has the following ground-water information been reported to the Department: 75.265(n)(18)(ii)

(a)(i) During the first year, initial background concentrations of parameters listed in 75.265(n)(8)(i) within 15 days after completing each quarterly analysis required during the first year?

X

(ii) For each well, have any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplies been separately identified?

X

(b)(i) Semi-annual measurements of the parameters establishing ground-water quality (75.265(n)(8)(ii)) for each ground-water monitoring well taken at the end of the first (April 1) and third (October 1) quarters?

X

(ii) Have any significant differences from the initial background found in the wells been separately identified?

X

(iii) Has this information been submitted as part of the quarterly report (75.265(m)) for those facilities receiving hazardous waste from off-site sources?

N/A

(c)(i) Quarterly measurement of the parameters used as indicators of ground-water contamination (75.265(n)(8)(iii)) and the required evaluations of these parameters under 75.265(n)(14)?

X

(ii) Have any significant differences from initial background found in the upgradient wells been separately identified and included in the quarterly submission?

X

(d)(i) Quarterly results of the evaluation of ground-water surface elevations under 75.265(n)(17)?

X

(ii) If applicable, has a description of the response to that evaluation been included?

X

Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Solid Waste Management

PAD003015-328
I.D. Number

6-21-84
Date Prepared

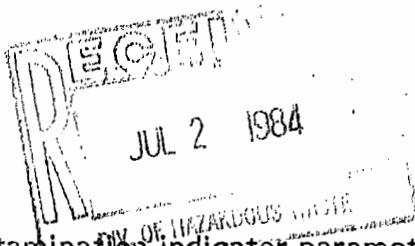
Hazardous Waste Management

Inspection Compliance Checklist for a Facility Which
May Be Affecting Ground-Water Quality
(Form 5)

Facility Name Raymark Industries Facility Permit Number IW 300628
County Lancaster Municipality Manheim
Company Address 123 E Stiegel St Inspector's Name G-L Harder / TJ Miller
Manheim PA 17545
Company Contact/Official George Houser Branch/Organization BSWM / Pa DER
Title Project Engineer Date of Inspection 6-19-84

Type of facility: (check appropriately)

- a) surface impoundment
b) landfill
c) land treatment facility
d) disposal waste pile



Have comparisons of ground-water contamination indicator parameters (75.265(n)(8)(iii)) for the upgradient well(s) shown a significant increase (or pH decrease as well) over initial background? 75.265(n)(14)(i)

Yes No Unknown

X

- a) If "Yes", has this information been submitted to the Department according to 75.265(n)(18)(ii)(B)?

X

Have comparisons of indicator parameters for the downgradient wells (75.265(n)(8)(iii)) shown a significant increase (or pH decrease as well) over initial background? 75.265(n)(14)(ii)

X

- a) If "Yes", were additional ground-water samples taken for those downgradient wells where the significant difference was determined? 75.265(n)(14)(ii)

X

- 1) Were samples split in two?

 X

- 2) Was the significant difference due to human (e.g., laboratory) error? If "Yes", do not continue.

 X

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>
If significant differences were not due to error, was a written notice sent to the Department within 7 days of confirmation? 75.265(n)(15)	<u>X</u>	_____	_____
Within 30 days of notification of the Department, was a certified ground-water quality assessment plan, based on the outline required by 75.265(n)(13), developed and submitted for approval? 75.265(n)(15)(i)	<u>X</u>	_____	_____
a) Does the plan specify 75.265(n)(15)(ii):			
1) well information (specifics)	<u>X</u>	_____	_____
(a) number?	<u>X</u>	_____	_____
(b) locations?	<u>X</u>	_____	_____
(c) size?	<u>X</u>	_____	_____
(d) depths?	<u>X</u>	_____	_____
2) sampling methods?	<u>X</u>	_____	_____
3) analytical methods?	<u>X</u>	_____	_____
4) evaluation procedures?	<u>X</u>	_____	_____
5) abatement procedures?	_____	_____	_____
6) schedule of implementation?	<u>X</u>	_____	_____
b) Does the plan allow for determination of 75.265(n)(15)(iii):			
1) Rate and extent of migration of hazardous waste or hazardous waste constituents in the ground water?	<u>X</u>	_____	_____
2) Concentrations of the hazardous waste or hazardous waste constituents in the ground water?	<u>X</u>	_____	_____
c) Is it indicated that the first determination was made as soon as technically feasible? 75.265(n)(15)(iv)	<u>X</u>	_____	_____
1) Within 15 days after the first determination, was a written report containing the assessment of ground-water quality submitted to the Department?	_____	_____	<u>X</u>

?

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>
d) Was it determined that hazardous waste or hazardous waste constituents from the facility have entered the ground water?	<u>X</u>	_____	_____
1) If "No", was the original indicator evaluation program, required by 75.265(n)(7) - 75.265(n)(12) and 75.265(n)(14), reinstated?	_____	_____	_____
a) Was the Department notified of the reinstatement of program within 15 days of the determination? 75.265(n)(15)(v)	_____	_____	_____
e) If it was determined that hazardous waste or hazardous waste constituents have entered the ground water (75.265(n)(15)(vi)):			
1) For facilities where the program was implemented prior to final closure, are determinations of hazardous waste or hazardous waste constituents continued on a quarterly basis?	<u>X</u>	_____	_____
(If the program was implemented during the post-closure care period, determinations made in accordance with the ground-water quality assessment plan may cease after the first determination.)			
(a) Were subsequent ground-water quality reports submitted to the Department within 15 days of determination?	<u>X</u>	_____	_____
(b) Has an approvable abatement plan, to be used to abate the ground-water contamination, been developed and submitted to the Department?	_____	<u>X</u>	_____
2) Were records kept of the analyses and evaluations, specified in the ground-water quality assessment (throughout the active life of the facility)? 75.265(n)(19)(i)	<u>X</u>	_____	_____
(a) If a disposal facility, were(are) records kept throughout the post-closure period as well?	<u>N/A</u>	_____	_____
f) Are annual reports being submitted to the Department by January 31, which contain the results of the ground-water quality assessment program? 75.265(n)(19)(ii)	<u>X</u>	_____	_____
1) Do the reports include the calculated or measured rate of migration of hazardous waste or hazardous waste constituents in the ground water during the reporting period?	_____	<u>X</u>	_____
2) Do the reports include the measured volumes of hazardous waste or hazardous waste constituents removed from ground water using the abatement procedures specified in 75.265(n)(15)(vi)(C)?	_____	<u>N/A</u>	_____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.

Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection - *Raymark Industries - Manheim, Pa.*

DATE:

PAD 003015328

FROM: *ok* Gregory A. Koltonuk, Environmental Scientist
RCRA Enforcement Section (3HW11)

Raybestos-Manhattan inc

TO: File

Thru: *[Signature]* Peter W. Schall, Chief
RCRA Enforcement Section (3HW11)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY
REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS
REQUIRED AT THIS TIME.

HAZARDOUS WASTE INSPECTION REPORT
TSD Facilities - Part A

Cy-5-84

Date of inspection 6-14-84 Time start 10:30 Time finish 12:00
Name of inspector Greg Harder
Company, installation name Ragmole Industries
Location 123 E Stiegel St.
County Lancaster Municipality Manheim
Identification number PAD003 015 328
Name of responsible official Clay R Smith
Title President + Gen. manager, Ind. Div.
Mailing address 100 Oakville Drive Trumbull CT 06611
Area code and phone no. 203 - 371 - 0101
Name of person interviewed George R. Houser
Title Project Engineer
Mailing address (if different from above) 123 E Stiegel St. Manheim PA
Area code and phone no. 717 - 665 - 2211 12545

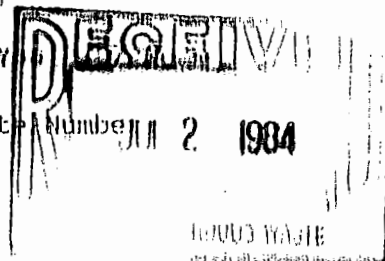
Site characterization:

- a. ☐ Treatment - ☐ surface impoundments, ☐ chemical, ☐ physical, ☐ biological
b. ☒ Storage - ☒ containers, ☐ tanks, ☐ surface impoundments, ☐ waste piles
c. ☒ Disposal - ☐ land treatment, ☒ landfill, ☐ incineration, ☐ thermal treatment
d. ☐ Use, ☐ reuse, ☐ recycle, ☐ reclaim

Does the facility generate hazardous wastes? ☒ Yes

Types of hazardous waste produced by Hazardous Waste

1001, 1002, 1003



Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART B General p.1

1-NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

VIOLANCE STATUS		REQUIREMENT	CHAPTER CITATION
3	4		
		Part A permit application submitted.	(a) (2), (2)
		Identification number.	(b)
X		Wastes accepted at facility transported by haulers licensed to transport hazardous waste by the Department.	(b) (1)
Y		Waste streams not covered by permit approved by the Department before acceptance (c) (1)	
		Chemical and physical analyses repeated as required.	(c) (1)
X		All waste shipments inspected and sampled.	(c) (2)
		Waste analysis plan on-site.	(c) (3)
		24 hr. surveillance at active portion.	(d) (2) (1)
		Artificial barrier at active portion.	(d) (2) (1)
		Proper signs posted and legible at a distance of at least 25 ft.	(d) (3)
		Inspection schedule on-site.	(e) (1)
		Maintenance schedule on-site for equipment or structures which reveal deterioration or malfunction.	(e) (4)
		Immediate remedial action taken where a hazard is imminent or has already occurred.	(e) (4)
		On the job or classroom personnel training program.	(f)
		Records retained for each employee at facility of training, job title, and job description.	(f) (6), (1)
		Ignitable or reactive wastes separated from source of ignition or reaction.	(g) (1)
		No smoking signs displayed where there are hazards from ignitable or reactive wastes.	(g) (1)
		Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements.	(g) (2)
		Facility equipped with internal alarm system capable of providing immediate emergency instruction to personnel.	(h) (2) (1)
		Facility equipped with a device for summoning outside emergency assistance.	(h) (2) (1)
		Facility equipped with fire control, spill control, and decontamination equipment.	(h) (2) (1)
		Facility equipped with water at adequate volume and pressure to supply fire control equipment.	(h) (2) (1)
		Facility communications or alarm system, fire control, spill control, and decontamination equipment tested and maintained.	(h) (3)
		Adequate safe space established to allow unhindered movement of personnel and equipment during emergency.	(h) (8)
		Contingency plan on-site and implemented.	(i) (1)
		Contingency plan describes action taken by personnel in the event of	

Ragmar
6-19-84

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DIV. OF HAZARDOUS WASTE

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART B General p.2.

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

VIOLANCE TUS		REQUIREMENT	CHAPTER CITATION
3	4		
		Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.	(i) (6)
		Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item	(i) (7)
		Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	(i) (8)
		One employee designated as the primary emergency coordinator either on the premises or on call.	(i) (11)
		Facility accepting only PA manifests - <i>cliptive</i>	(j)
		Manifests properly completed and routed within time limits (24 hrs.)	(j) (2) (3)
		Manifest discrepancies resolved or reported within time limits	(j) (10) (1)
		Written operating record maintained on the premises	(k)
		Written operating record contains description and quantity of wastes and method of treatment, storage or disposal	(k) (2) (i)
		Written operating record contains location and quantity of each hazardous waste	(k) (2) (ii)
		Written operating record contains results of waste analyses and treatability tests	(k) (2) (iii)
		Written operating record contains reports and details of all incidents	(k) (2) (iv)
		Written operating record contains records and results of all inspections	(k) (2) (v)
		Written operating record contains required monitoring, testing, and analytical data	(k) (2) (vi)
		Written operating record contains closure and post-closure cost estimates	(k) (2) (vi)
		All records retained on premises and available for inspection	(l)
		Quarterly reports submitted to the Department	(m)
		Emissions, discharges, fires, explosions, and groundwater contamination reported as required	(m) (2)
		Groundwater monitoring wells located at approved sites	(n) (2)
		Adequate protection of groundwater monitoring wells	(n) (7)
		Groundwater sampling and analysis plan on the premises	(n) (8)
		Groundwater quality assessment and abatement on file on the premises	(n) (14)
		Closure plan on the premises and up-to-date	(o) (2) (v)
		Post-closure plan on the premises and up-to-date	(o) (10) (1)
		Annual closure cost estimate on the premises and up-to-date	(p) (2) (1)
		Annual post-closure cost estimate on the premises and up-to-date	

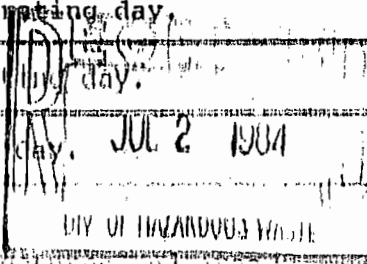
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6-19-84

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DIV. OF HAZARDOUS WASTE

75.265

1 - NON-COMPLIANCE, 2 - COMPLIANCE, 3 - NOT APPLICABLE, 4 - NOT DETERMINED

PAGE NO.		REQUIREMENT	CHAPTER CITATION
3	4		
		Containers managed to prevent leaks and spills	(q) (1), (2)
		Containers are compatible with waste stored.	(q) (2)
		Containers are closed during storage	(q) (3)
		Container storage area inspected weekly for leaks, deterioration, etc.	(q) (5)
		Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q) (6)
		Satisfactory procedures followed for handling incompatible wastes.	(q) (7), (8)
		Incompatible wastes separated or protected from other materials.	(q) (9)
		Containers and tanks labeled to identify accurately hazardous waste contained.	Act 97 Section 403(b)
		Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	(r) (2)
		Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r) (3)
		Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(r) (4)
		Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.	(r) (4)
		Continuously fed tanks equipped with a means to stop the inflow.	(r) (5)
		Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.	(r) (6)
		Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	(r) (7)
		Discharge control equipment inspected once each operating day.	(r) (8) (i)
		Monitoring equipment data inspected once each operating day.	(r) (8) (ii)
		Liquid level of tanks inspected once each operating day.	(r) (8) (iii)
		Construction materials of tanks inspected weekly.	(r) (8) (iv)
		Construction materials of discharge containment structures and area immediately surrounding inspected weekly.	(r) (8) (v)
		All hazardous waste removed from tanks and related appurtenances at closure.	(r) (9)
		Placement of ignitable or reactive waste only with the Department's approval.	(r) (10)
		Covered tanks in which ignitable or reactive waste is treated or stored must meet buffer zone requirements.	(r) (11)

Rayman-4
6-14-84

75.265

IMPLIANCE STATUS			REQUIREMENT	CHAPTER CITATION
Z	3	4		
X			Run-on diverted away from the facility	(v) (2)
X			Run-off collected from the active portions	(v) (3)
X			Run-off collected from the active portions and managed as a hazardous waste if it is a hazardous waste.	(v) (3)
X			Facility is managed to prevent wind dispersal of hazardous waste.	(v) (5)
	X		The exact location and dimension, including depth of each cell with respect to permanently surveyed benchmarks kept on a map in the operating record.	(v) (6) (i)
	X		The contents of each cell and the approximate location of each hazardous waste type within each cell kept in the operating record.	(v) (6) (i)
X			Closure and post-closure requirements are complied with.	(v) (7) - (10)
X			Ignitable and reactive wastes disposed of with Department approval.	(v) (11)
X			Precautions taken for the disposal of incompatible wastes and materials	(v) (12)
X			Hazardous wastes disposed contains greater than 20% solids content by dry weight and are non-flowable and do not contain free liquid.	(v) (13)
X			Written approval from the Department to dispose of hazardous wastes containing less than 20% solids content by dry weight and are flowable until November 16, 1981	(v) (13)
X			Hazardous waste co-disposed with municipal waste with Department approval	(v) (14)
X			Empty containers crushed flat, shredded, or similarly reduced in volume before disposal	(v) (15)

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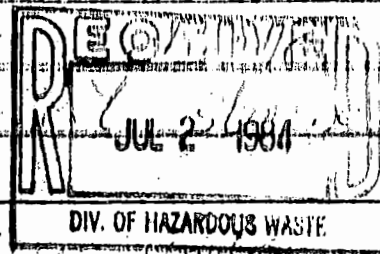
JUL 2 1984

DIV. OF HAZARDOUS WASTE

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

Date of inspection 6-14-84 Identification number PAD003 015-328
Company, Installation name Raymark Industries
City Lancaster Municipality Marbleton

Raymark is planning on eliminating drum storage and limiting accumulation to ~~days~~ ninety days. Currently master Annex is being stored for more than 90 days. To eliminate storage status a closure plan should be submitted. Closure plan should include a method of determining the total both hazardous and non-hazardous waste accumulation and will be controlled in building 51 as per PCB storage area plans. Raymark should submit to the Department a better definition of a closure plan to the closure plan.



Second time inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. Findings of this inspection are shown in this report. Any violations which were uncovered by the inspection are indicated. Violations may also be discovered upon examination of results of laboratory analyses and review of Department records. Notification will be coming, confirming any violations indicated herein and listing any additional violations.

Interviewed (signature) _____ Date _____

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

Date of inspection 6-14-84 Identification number PAD003015 52
Company, Installation name Ryan's Industries
City Lancaster Municipality Mechanic

Please submit within ten working days
a plan for operating the site in a
manner which will prevent or minimize
surface water penetration into the
solid waste.

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JUL 2 1984
DIV OF HAZARDOUS WASTE

Inspection report is official notification that a representative of the Department of
Environmental Resources, Bureau of Solid Waste Management, inspected the above installation.
Findings of this inspection are shown in this report. Any violations which were uncovered
by the inspection are indicated. Violations may also be discovered upon examination of
results of laboratory analyses and review of Department records. Notification will be
coming, confirming any violations indicated herein and listing any additional violations.

Interviewed (signature) [Signature] Date 6/19/84
Director (signature) [Signature] Date 6/19/84

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.
Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection - *Raymark Industries - Raybestos*
PAD003015328

DATE: 5/14/84

FROM: *Gregory A. Koltonuk*, Environmental Scientist
RCRA Enforcement Section (3HW11)

TO: File

Thru: Peter W. Schaul, Chief *[Signature]*
RCRA Enforcement Section (3HW11)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE
VIOLATIONS.

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part A

CO
Frank 4/24

4-2-84

Date of inspection 3-26-84 Time start 10:00 Time finish 10:30
Name of inspector Greg Harder
Company, installation name Raymark Industries
Location 123 E Stiegel St.
County Lancaster Municipality Manheim
Identification number PAD 003 015 328
Name of responsible official Craig R Smith
Title President Gen. Manager, Industrial Div.
Mailing address 100 Oakville Drive Trumbull CT 06611
Area code and phone no. 203-371-0101
Name of person interviewed George R Houser
Title Project Engineer
Mailing address (if different from above) 123 E Stiegel St. Manheim PA
Area code and phone no. 717-665-2211 1754

Current waste handling method:

- a. ☒ On-site ☐ treatment, ☒ storage, ☒ disposal
b. ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☒ Off-site ☐ use, ☒ reuse, ☐ recycle, ☐ reclaim

Amount of hazardous waste produced:

- a. 40,000 16/yr kg./mo.
b. kg./yr.

Types of hazardous waste produced by Hazardous Waste Number:

D001 F005 D008

Are hazardous wastes transported off-site by the generator? ☐ Yes ☐ No

YES - D001 thru transfer -> American Reclaim



Ragman-4
3-26-84

RANGE RUS		REQUIREMENT	CHAPTER CITATION
3	4		75.262
		Identification number	(c) (1)
		Hazardous waste shipments offered only to licensed transporters	(c) (4)
		Authorization received from TSD facility for wastes shipped off-site	(d)
		PA manifest used for intrastate shipments	(e) (1)
		Disposer state manifest or EPA format manifest used for out-of-state shipments	(e) (1)
		Manifests filled out properly and completely	(e) (1)
		Manifests routed properly and within time limits (24 hours)	(e) (2)
		Proper U.S. DOT shipping containers or packages	(f) (1)
		Shipping containers marked and labeled according to U.S. DOT	(f) (1)
		Containers of 110 gal. or less marked with required PA label	(f) (1)
X		Placards offered to transporter	(f) (2)
X		Wastes accumulated on-site for less than 90 days <i>is TSD</i>	(g) (1)
		Wastes stored in proper containers and properly marked and labeled	(g) (1)
		Containers managed in accordance with 75.265(g)	(g) (1)
		Containers clearly marked with accumulation date and visible for inspection	(g) (1)
X		Records retained at designated location for 20 years.	(h)
		Quarterly reports submitted to the Department	(i)
		Exception reporting procedures followed	(j)
		Hazardous waste disposal plan, if required	(l)
		Spill reporting procedures followed - <i>no spills reported</i>	(m) (1)
		Preparedness, Prevention and Contingency Plan approved and implemented	(m) (5)
		Special requirements followed for international shipments	(o)

HAZARDOUS WASTE INSPECTION REPORT
TSD Facilities - Part A

CL A-2-84

of inspection 3-26-84 Time start 10:30 Time finish 1:00
of inspector Greg Harder
any, installation name Rayman-4 Industries
tion 123 E Stiegel St.
y Lancaster Municipality Manheim
ification number PAD003 015 328
of responsible official Craig R Smith
President + Gen. Manager, Industrial Div.
g address 100 Oakville Drive Trumbull CT 06611
ode and phone no. 203-371-0101
of person interviewed George R Houser
Project Engineer
g address (if different from above) 123 E Stiegel St. Manheim PA
ode and phone no. 717-665-2211 17545

te characterization:

☐ Treatment - ☐ surface impoundments, ☐ chemical, ☐ physical, ☐ biological
☒ Storage - ☒ containers, ☐ tanks, ☐ surface impoundments, ☐ waste piles
☒ Disposal - ☐ land treatment, ☒ landfill, ☐ incineration, ☐ thermal treat-
☐ Use, ☐ reuse, ☐ recycle, ☐ reclaim

as the facility generate hazardous wastes? ☒ Yes ☐ No

es of hazardous waste produced by Hazardous Waste Number:

D001

F005

D008

hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

TREATMENT, STORAGE, DISPOSAL FACILITIES - STORAGE (Containers and Tanks)

75.265.

1-NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

CHANCE TUS		REQUIREMENT	CHAPTER CITATION
3	4		
		Containers managed to prevent leaks and spills	(q) (1),
		Containers are compatible with waste stored.	(q) (2)
		Containers are closed during storage	(q) (3)
		Container storage area inspected weekly for leaks, deterioration, etc.	(q) (5)
		Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q) (6)
		Satisfactory procedures followed for handling incompatible wastes.	(q) (7),
		Incompatible wastes separated or protected from other materials.	(q) (9)
		Containers and tanks labeled to identify accurately hazardous waste contained.	Act 97 Section 403(b)
		Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	(r) (2)
		Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r) (3)
		Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(r) (4)
		Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.	(r) (4)
		Continuously fed tanks equipped with a means to stop the inflow.	(r) (5)
		Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.	(r) (6)
		Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	(r) (7)
		Discharge control equipment inspected once each operating day.	(r) (8) (i)
		Monitoring equipment data inspected once each operating day.	(r) (8) (i)
		Liquid level of tanks inspected once each operating day.	(r) (8) (i)
		Construction materials of tanks inspected weekly.	(r) (8) (i)
		Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.	(r) (8) (v)
		All hazardous waste removed from tanks and related appurtenances at closure.	(r) (9)
		Placement of ignitable or reactive waste only with the Department's approval	(r) (10)
		Covered tanks in which ignitable or reactive waste is treated or stored meets NEPA buffer zone requirements.	(r) (11)

Rm mar 4
3-26-84

75.265

[illegible]

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

Date of inspection 3-26-84 Identification number PAD 003 015 328
Company, Installation name Raymark Industries
County Lancaster Municipality Manheim

One container labeled MCL (D001) in the drum storage area overflowed and was spilling onto the ground even though it appeared to have a lid. Spill residue should be collected and contents transferred to a container in good condition within one working day.

75.265 (g)(1, 5)

A group of approximately 45 drums in the storage area were without labels or accumulation dates in violation of 75.262 (f)(1)(iii), 75.262 (g)(1)(iv), and 75.262 (g)(2)(iii). All containers should be properly marked and labeled within one week.

Rain water has accumulated in the HW landfill area in two "pools". This is in violation of the Landfill Rules & Regulations, 75.24 (c)(1)(xviii) which requires that surface water percolation into the solid waste be prevented or minimized. It is recommended

inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. Findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Interviewed (signature) _____

Date _____

Director (signature) _____

Date _____

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

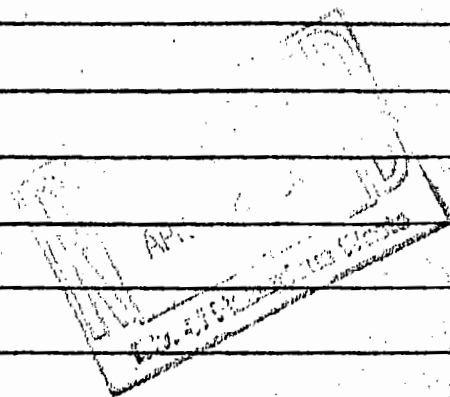
Date of inspection 3-26-84 Identification number PAD003 015 328

Company, Installation name Raymark Industries

County Lancaster Municipality Manheim

that this water be removed to an appropriate
TSD facility after completing the HW determination.

Please submit written documentation
to the Department upon correction of
these violations.



This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. Findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person interviewed (signature) George R. [illegible] Date 3/26/84

Inspector (signature) [illegible] Date 3.27.84

Hazardous Waste Monitoring And Enforcement Log

1. EPA ID: <u>1P1A1D101013101151312181</u>						4. FACILITY TYPE: <input checked="" type="checkbox"/> MAJOR <input type="checkbox"/> NON-MAJOR																																											
2. FACILITY NAME: <u>Raymark Industries</u>																																																	
3. ADDRESS: <u>123 E Stiegel St. Manheim PA 17545</u>																																																	
5. TYPE OF REPORT:				<input checked="" type="checkbox"/> NEW <input type="checkbox"/> UPDATE																																													
6. DATES OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT:				START <u>3/26/84</u> M D Y																																													
7. TYPE OF EVALUATION COVERED BY THIS REPORT:				<input checked="" type="checkbox"/> EVALUATION INSPECTION <input type="checkbox"/> RECORD REVIEW <input type="checkbox"/> SAMPLING INSPECTION <input type="checkbox"/> SPECIAL INSPECTION																																													
8. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5):				START <u> / / </u> M D Y																																													
9. TYPE AND CLASS OF VIOLATION (enter number of violations by type and class):				<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th rowspan="2" style="width: 15%;">Class of Violation</th> <th colspan="6" style="text-align: center;">Area of Violation</th> <th rowspan="2" style="width: 10%;">Manifest</th> <th rowspan="2" style="width: 10%;">Other</th> </tr> <tr> <th style="width: 10%;">GWM</th> <th style="width: 10%;">CI/PC</th> <th style="width: 10%;">Fin. Res.</th> <th style="width: 10%;">Pt. B</th> <th style="width: 10%;">Comp. Sched.</th> <th style="width: 10%;"></th> </tr> <tr> <td style="text-align: center;">I</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td> </tr> <tr> <td style="text-align: center;">II</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td> </tr> <tr> <td style="text-align: center;">III</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td style="text-align: center;">2</td> </tr> </table>				Class of Violation	Area of Violation						Manifest	Other	GWM	CI/PC	Fin. Res.	Pt. B	Comp. Sched.		I									II									III								2
Class of Violation	Area of Violation						Manifest		Other																																								
	GWM	CI/PC	Fin. Res.	Pt. B	Comp. Sched.																																												
I																																																	
II																																																	
III								2																																									
10. ENFORCEMENT ACTIONS for Class I Violations:																																																	
Area of Violation	Type of Action Taken (circle one)	Date Action Taken (mdy)	Projected Compliance Date (mdy)	Actual Compliance Date (mdy)	Penalty (\$000)																																												
					Assessed	Collected																																											
<u>Other</u>	<u>Informal</u> WL/NOV AO CivAc CrimAc	<u>3/26/84</u>	<u>4/2/84</u>	<u> / / </u>																																													
	Informal WL/NOV AO CivAc CrimAc	<u> / / </u>	<u> / / </u>	<u> / / </u>																																													
	Informal WL/NOV AO CivAc CrimAc	<u> / / </u>	<u> / / </u>	<u> / / </u>																																													
	Informal WL/NOV AO CivAc CrimAc	<u> / / </u>	<u> / / </u>	<u> / / </u>																																													
11. COMMENTS: <u>2 violations noted relating to leaking container and unlabeled drums of HW</u>																																																	

MAY 10 1984

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.

Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection - *Raymark Industries - Manheim, Pa.*

PAD 003015328

DATE: *2/15/84*

FROM: Gregory Koltonuk *gk*
Environmental Scientist (3AW22)

TO: File

THRU: Peter Schaul *PS*
Chief, Waste Enforcement Section (3AW22)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE
FACILITY REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER
ACTION IS REQUIRED AT THIS TIME.

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part A

CE
12-29-83

CO
Honey

ate of inspection 12-20-83 Time start 10:00 Time finish 10:30
ame of inspector Greg Hader Tom Miller
ompany, installation name Raymark Industries
ocation 123 E Stiegel St.
ounty Lancaster Municipality Manheim
entification number PAD003015328
ame of responsible official Craig R Smith
itle President / Gen. Manager, Industrial Div.
ailing address 100 Oakville Drive, Trumbull CT 06611
rea code and phone no. 203 - 371 - 0101
ame of person interviewed George R Houser
itle Project Engineer
ailing address (if different from above) 123 E Stiegel St, Manheim PA
rea code and phone no. 717 - 665 - 2211 17545

Current waste handling method:

- a. ☒ On-site ☐ treatment, ☒ storage, ☒ disposal
b. ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☒ Off-site ☐ use, ☒ reuse, ☐ recycle, ☐ reclaim

Amount of hazardous waste produced:

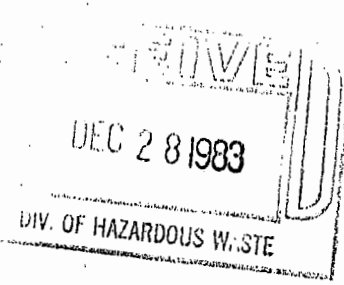
- a. 40,000 lb/yr kg./yr.
b. _____ kg./yr.

Types of hazardous waste produced by Hazardous Waste Number:

D001 F003 F005 D008

Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

2001/F005 Armstrong → Chem-clear
D001 Houser →



HAZARDOUS WASTE INSPECTION REPORT
Generators - Part B

1 - NON-COMPLIANCE, 2 - COMPLIANCE, 3 - NOT APPLICABLE, 4 - NOT DETERMINED

VIOLANCE TUS		REQUIREMENT	CHAPTER CITATION
3	4		
		Identification number	(c) (1)
		Hazardous waste shipments offered only to licensed transporters	(c) (4)
		Authorization received from TSD facility for wastes shipped off-site	(d)
		PA manifest used for intrastate shipments	(e) (1) (i)
		Disposer state manifest or EPA format manifest used for out-of-state shipments	(e) (1) (iii)
		Manifests filled out properly and completely	(e) (1)
		Manifests routed properly and within time limits (24 hours)	(e) (2)
		Proper U.S. DOT shipping containers or packages	(f) (1) (i)
		Shipping containers marked and labeled according to U.S. DOT	(f) (1) (ii)
		Containers of 110 gal. or less marked with required PA label	(f) (1) (iii)
X		Placards offered to transporter	(f) (2)
X		Wastes accumulated on-site for less than 90 days	(g) (1)
		Wastes stored in proper containers and properly marked and labeled	(g) (1) (ii)
		Containers managed in accordance with 75.265(g)	(g) (1) (iii)
		Containers clearly marked with accumulation date and visible for inspection	(g) (1) (iv)
X		Records retained at designated location for 20 years.	(h)
		Quarterly reports submitted to the Department	(i)
		Exception reporting procedures followed	(j)
X		Hazardous waste disposal plan, if required	(l)
		Spill reporting procedures followed	(m) (1)
		Preparedness, Prevention and Contingency Plan approved and implemented	(m) (5)
X		Special requirements followed for international shipments	(o)

Razman 12-20-83

15 TSD

no exceptions reported

no spills reported

approved and implemented

HAZARDOUS WASTE INSPECTION REPORT
TSD Facilities - Part A

12-22-83

Date of inspection 12-20-83 Time start 1030 Time finish 12:00
Name of inspector Greg Haeder, Tom Miller
Company, installation name Raymark Industries
Location 123 E Stigler St.
County Lancaster Municipality Manheim
Identification number PA10003 015 328
Name of responsible official Craig R Smith
Title President and General Manager, Industrial Div.
Mailing address 100 Oakville Drive Trumbull CT 06611
Code and phone no. 203 - 371 - 0101
Name of person interviewed George R. Houser
Title Project Engineer
Mailing address (if different from above) 123 E Stigler St, Manheim
Code and phone no. 717-665-2211 PA 17545

Site characterization:

- ☐ Treatment - ☐ surface impoundments, ☐ chemical, ☐ physical, ☐ biological
- ☒ Storage - ☒ containers, ☐ tanks, ☐ surface impoundments, ☐ waste piles
- ☒ Disposal - ☐ land treatment, ☒ landfill, ☐ incineration, ☐ thermal treatment
- ☐ Use, ☐ reuse, ☐ recycle, ☐ reclaim

Does the facility generate hazardous wastes? ☐ Yes ☐ No

Types of hazardous waste produced by Hazardous Waste Number:

Are hazardous wastes transported off-site by the facility? ☐ Yes ☐ No

1001, F005, 1008

TREATMENT, STORAGE, DISPOSAL FACILITIES - STORAGE Containers and Tanks)

75.265

1-NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
X				Containers managed to prevent leaks and spills	(q) (1), (
X				Containers are compatible with waste stored.	(q) (2)
X				Containers are closed during storage	(q) (3)
X				Container storage area inspected weekly for leaks, deterioration, etc.	(q) (5)
X				Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q) (6)
X				Satisfactory procedures followed for handling incompatible wastes.	(q) (7), (
X				Incompatible wastes separated or protected from other materials.	(q) (9)
X				Containers and tanks labeled to identify accurately hazardous waste contained.	Act 97 Section 403(b)
				Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	(r) (2)
				Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r) (3)
				Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(r) (4)
				Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.	(r) (4)
				Continuously fed tanks equipped with a means to stop the inflow.	(r) (5)
				Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.	(r) (6)
				Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	(r) (7)
				Discharge control equipment inspected once each operating day.	(r) (8) (i)
				Monitoring equipment data inspected once each operating day.	(r) (8) (i)
				Liquid level of tanks inspected once each operating day.	(r) (8) (i)
				Construction materials of tanks inspected weekly.	(r) (8) (i)
				Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.	(r) (8) (v)
				All hazardous waste removed from tanks and related appurtenances at closure.	(r) (9)
				Placement of ignitable or reactive waste only with the Department's approval	(r) (10)
				Covered tanks in which ignitable or reactive waste is treated or stored meets NFPA buffer zone requirements.	(r) (11)
				Precautions taken for handling ignitable, reactive or incompatible waste or material.	(r) (12), (

R43411-6 12-20-83

75.265

[illegible]

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

411.1.1

Date of inspection 12-20-83 Identification number PAD003 015-328

Company, Installation name Rasmussen

County Land. Municipality Marheim

During this inspection, ground water monitoring wells were inspected for construction, depth, static water level, etc.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) George R. Brown Date 12/20/83

Inspector (signature) 32 [Signature] Date 12-20-83